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ABSTRACT

This volume contains the "Final Report" of a study commissioned to document how States met the requirements of Title I of the Elementary and Secondary Education Act of 1965, as amended in 1978, and to identify management practices and documents that can be used by States to facilitate their management of Title I programs and those of Chapter 1 of the Education Consolidation and Improvement Act that superseded Title I in 1981. State documents and materials were reviewed; indepth telephone interviews were conducted with 49 State Title I coordinators; and onsite interviews were conducted with a nationally representative sample of 20 State Title I coordinators and their staffs. Finally, 60 school districts from the 20 States were visited, and 28 were contacted by telephone. This volume contains the executive summary, discusses the evolution of the State role in Title I, presents the study methodology, and details the resources available for administration of Title I programs. The remaining 90 percent of the document presents the results from the interviews followed by a sampling of district comments for each of the major State responsibilities: State rulemaking, application approval, monitoring, technical assistance and dissemination, evaluation, parent involvement, and enforcement. (MLF)

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A Study of State Management Practices:
Looking Back at Title I and Toward Chapter 1

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FINAL REPORT

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A STUDY OF STATE MANAGEMENT PRACTICES: LOOKING BACK AT TITLE I AND TOWARD CHAPTER 1

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EXECUTIVE SUMMARY

INTRODUCTION

Title I of the "Act to strengthen and improve educational quality and educational opportunities in the nation's elementary and secondary schools," henceforth known as the Elementary and Secondary Education Act (ESEA), was signed into law in 1965 as Public Law 89-10. The law was later amended so that Title I services could also be provided to handicapped children (P.L. 89-13 in 1965); Indian children, agricultural migrant children, and children in institutions for the neglected and delinquent (P.L. 89-750 in 1966); and children of migratory fishermen (P.L. 93-380 in 1974). The last amendment, Public Law 95-561 in 1978, remained in effect until 1 July 1982, when it was superceded by Chapter 1 of the Education Consolidation and Improvement Act (ECIA) of 1981. The basic law had three fundamental purposes, which remained unchanged throughout its 16-year history. These are to:

- provide financial assistance to Local Education Agencies that have concentrations of children from low-income families,
- expand and improve educational programs for educationally deprived children residing in these low-income areas, and
- provide educational programs that are sensitive and responsive to the special needs of educationally deprived children.

The educational programs provided under the Title I law were highly visible to the public. Title I was the largest federally funded educational program in the United States; more than 6 million children in over 14,000 school districts received Title I services in school year 1980-81. More than $3.2 billion was allocated to Title I programs in school year 1980-81.

The Title I law specified the responsibilities and duties of educational agencies at the federal, state, and local levels and created a three-tiered administrative organization for the Title I program. The legislative branch of the federal government was responsible for writing and amending the legislation and appropriating funds to implement the legislation, while the executive branch, the Department of Education (ED) in this case, prepared the regulations to implement the requirements of the statute and distributed funds to the State and Local Education Agencies. Each State Education Agency (SEA) had the responsibilities of interpreting the statute for districts within its state, disseminating information about the requirements, providing technical assistance to districts on each of the program requirements, monitoring and enforcing Title I statutes and regulations, and reporting to the Secretary of Education on state as well as local Title I activities and practices. The design and delivery of Title I funded services to children was in the purview of the Local Education Agencies (LEAs).

The success of such a large and complex program depends, in part, upon its successful administration at the federal, state, and local levels. Previous studies found the relationships between the three levels of administration to be significantly intertwined. The Planar Corporation study, a multi-year investigation of Title I management practices at the federal, state, and local levels in 1973, found that (a) states are diverse in their administration of Title I programs, and (b) a complex relationship exists among the federal regulations, state administrative practices, and district implementation procedures.[1]

In 1976, the National Institute of Education (NIE) conducted a large-scale study of the administration of compensatory education. NIE's research, in which federal regulations, guidelines, and interpretive rules were examined, showed that the federal legal framework for Title I was, for the most part, internally consistent and conformed reasonably well to the Title I statute. However, the NIE study further concluded that clarity of the Title I legal framework was as important as is internal consistency, and that if the legal framework is not clear, either as formulated or as communicated, SEAs and LEAs may deviate or develop wayward interpretations of Title I legislation.[2] In recognition of the impact the federal administrative role has on SEA and LEA management practices in Title I, Congress, in 1978, directed specific changes to be made in the legal framework for Title I and to make the Title I administrative framework as clear and comprehensive as possible.

The Title I legislation in 1978 resulted in a much expanded role for states and greater administrative resources for carrying out some of these additional activities. Part Two of this report describes how the resources available for Title I programs are utilized. The particular responsibilities are described in detail in Part Three of this report.

RATIONALE AND STUDY DESIGN FOR THE STATE MANAGEMENT PRACTICES STUDY

The American Institutes for Research (AIR) was funded in July 1980 by the Department of Education (ED) to conduct a two-year study to assess the effects of changes in the Education Amendments of 1978 on state management practices in ESEA Title I.

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[1] Briggs, p. 6. A perspective on change: The administration of Title I of the Elementary and Secondary Education Act. Washington, DC: The Planar Corporation, 1973. Also, Planar Corporation, The silken purse: Legislative recommendations for Title I of the Elementary and Secondary Education Act. Washington, DC: The Planar Corporation, 1973.

[2] National Institute of Education. Administration of compensatory education. Washington, DC: National Institute of Education, 1977. Also, Goettel, R.J., Kaplan, B.A., & Orland, M.E. A study of the administration of the Elementary and Secondary Education Act (ESEA), Title I in eight states. Syracuse, NY: Syracuse Research Corporation, 1977.

The major purposes of the study are to:

- document how states, through their Title I guidelines and management practices, met the requirements of the Title I law as amended in 1978; and

- identify exemplary state management practices and documents that can be disseminated and used by states to facilitate their management of Title I programs.

State management of Title I programs was studied by the Planar Corporation in 1973 and again by the NIE Compensatory Education Study in 1976-77. Findings from the NIE study, in particular, were used as the basis for making changes to the Title I law when it was reauthorized in 1978. The 1978 Title I law, as noted earlier, expanded and strengthened state management responsibilities in Title I. These changes and their impact on states is one focus of this study.

The major questions under investigation by the study of state management practices are:

- How did states meet the requirements of the 1978 Title I law?

- What changes and improvements to state management practices resulted from the increased administrative funding and the new administrative requirements of the 1978 Title I law?

- What problems were encountered by states as they implemented the 1978 Title I law?

- What innovative or successful practices were developed by states as they implemented the 1978 Title I law?

To meet the study's objectives, three data collection efforts were designed. First, state documents and materials were reviewed to obtain one picture of state-level Title I management practices. Materials and documents that were considered by the study to be exemplary were compiled into four management modules (application approval, monitoring, parent involvement, and enforcement).[3]

Second, indepth telephone interviews were conducted with 49 state Title I coordinators to ascertain specific information about state practices, problems, and plans for operating Title I/Chapter 1 programs. States were queried about each of their major management responsibilities: State rulemaking, application approval, monitoring and monitoring enforcement plans, technical assistance and dissemination, evaluation, parent involve- ment, and enforcement, including audits and audit resolution, withholding of payments, and complaint resolution.

Third, onsite interviews were conducted with a nationally representative sample of 20 state Title I coordinators and their staffs to follow-up on issues raised during the telephone interviews and with a sample of district Title I coordinators in these states to obtain information on state management from a district perspective.

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[3] The four management modules are published separately:

Appleby, J.A. A study of state management practices: Looking back at Title I and toward Chapter 1. Management Module: Monitoring. Palo Alto, CA: American Institutes for Research, 1982. (AIR-857-8/82-FP)

Harrison, L.R. A study of state management practices: Looking back at Title I and toward Chapter 1. Management Module: Parent Involvement. Palo Alto, CA: American Institutes for Research, 1982. (AIR-857-8/82-FP)

Putman, K.E. A study of state management practices: Looking back at Title I and toward Chapter 1. Management Module: Application Approval. Palo Alto, CA: American Institutes for Research, 1982. (AIR-857-8/82-FP)

Putman, K.E. A study of state management practices: Looking back at Title I and toward Chapter 1. Management Module: Enforcement. Palo Alto, CA: American Institutes for Research, 1982. (AIR-857-8/82-FP)

CONCLUSIONS

While Congress may have felt that the end product (as defined by the 1978 Title I law) was needed in its existing form, the reactions of states suggest that Congress went too far. Some states, by obeying the letter of the law, let the spirit die. While strict compliance measures were undoubtedly correct for a "young" program in which states simply carried out federal policy, it was not clear that such prescriptive measures were appropriate for a "mature" program, such as Title I in its later years.[4]

States in the later years also appeared to become more resentful of the apparent negligence on the part of Congress to recognize the importance of state socio-contextual factors in the implementation of a large program, such as Title I. The State Management Practices Study noted major tensions that surfaced during interviews with state Title I coordinators--all pertain in some degree to the desire for greater local or state control, often at the expense of federal control.

States have rather deep-seated philosophies about the extent to which they adopt a "directive" or a "nondirective" posture in front of their districts. These philosophies can be set by the current education leaders in the state, such as the Chief State School Officers. A strong nondirective attitude may have been shaped by educational policymakers throughout the state's history. When both types of states attempt to implement a prescriptive law, several interesting outcomes are observed. First, some directive states appeared to resent federal intrusion into their domain. This attitude surfaced during discussions of state rulemaking, when several directive states indicated that they felt the federal government had intruded too far into their states' rights. They felt they had the right to make rules and they did not need the federal government to permit them to do so. These directive states may, also, have felt somewhat cheated by the numerous requirements, since numerous existing federal requirements made a directive posture less necessary for successful program admin- istration. Some of the nondirective states, on the other hand, secretly applauded the prescriptions in the 1978 statute, because it gave them the opportunity to enforce the rules they were not able to make freely. When federal requirements matched state program goals, these nondirective states appeared to have no resentment toward the extent of the Title I legal requirements. The fact that several very vocal nondirective states did not "disown" the federal requirements or strongly differentiate for their districts state from federal requirements offers some support for this statement.

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[4] Elmore, R.F., & McLaughlin, M.W. Strategic choices in federal education policy: The compliance-assistance trade-off. In A. Lieberman & M.W. McLaughlin (Eds.), Policy making in education. Chicago, IL: University of Chicago Press, 1982.

A second type of tension surfaced over attempts by states to fit the all-purpose legal requirements into *their* local situations. It was observed that parent advisory councils fit best in the eight percent of states with a history of such formal involvement; most other states preferred less strict arrangements to involve parents. Some districts had strong parent-teacher organizations or other local parent groups serving as their councils, even though they were not limited to the Title I program. States were occasionally forced to consider whether the intent of the law as perceived by states (that is, to have meaningful organized parent involvement at the local level) took precedence over the means to achieve that end or whether their districts had to comply with the letter of the law (including council composition and membership election)--even if it meant that local parent involvement would be weakened. Thus these states did *not* disagree with the federal goal of meaningful formal parent involvement, but they *did* resent the structure imposed on them by Congress to achieve this goal.

A third type of tension surfaced over the acceptance of the federal role in evaluation. Some states felt that evaluation was solely a local district activity; others felt that evaluation was a "local" activity in the sense that both states and their districts should be the primary initiators of the activity; while still others believed that, because of national program accountability, the federal government also had a role to play. These differing state attitudes toward the federal role influenced states' implementation of the federally mandated Title I evaluation models. States believing evaluation is solely a local concern appeared less than enthusiastic about the amount of effort required to implement the evaluation models. These states found the evaluation requirements particularly troublesome, perhaps, in part, because they were forced to play a role that they felt was inappropriate for them.

Thus, all three of these local-state-federal role issues affect implementation and administration of the Title I program. A challenge for this study was to arrive at a way of characterizing good management when taking these other factors into consideration.

Indepth examinations of how states implemented the 1978 Title I law show a consistent pattern displayed by some states to their management of Title I programs. They assumed a problem-solving stance in which they felt they should design their own materials and not rely on models produced by ED. These states adopted the three-year application approval cycle, and the cycle appeared to "work" for them and their districts by successfully reducing their paperwork as intended by Congress. These states actively monitored local programs by doing "extra" activities to ensure program quality; some were also active monitors to ensure program compliance; but they all had attitudes that the purpose of monitoring was to ensure program quality or *both* program quality and compliance, but *never* only to ensure compliance with the law. These states also tended to have very positive attitudes toward parent involvement; they also tended to be active at the state level conducting various parent involvement activities for their districts. These states provided large amounts of personalized technical assistance to their LEAs through face-to-face or small-group workshops rather than providing assistance in large-group settings, which are more impersonal.

The issues of local and state control blurs this picture somewhat when the state responsibilities of rulemaking and evaluation are concerned. To a less consistent degree, these same states also made rules to help their districts improve the quality of their programs and they actively helped their districts use evaluation data to improve their programs. An unexpected finding is the strong inverse correlation between activity in evaluation and parent involvement attitudes--high levels of evaluation activities are associated with negative attitudes towards parent involvement, particularly councils.

The states having this profile of activities are characterized as having a "quality" orientation toward management of their Title I programs. They present a contrast to those labeled as having a "compliance" orientation--they tend to be inactive generally throughout all areas of their state responsibilities, they like the idea of having ED develop models for different administrative activities, and they tend to favor less personalized methods of service delivery.

The quality-compliance issue has been addressed over the years. Congress, for example, in its report on the Education Amendments of 1978, was concerned over the comments made by states that compliance with particular requirements, namely implementation of the evaluation models, may not lead to meaningful data for program managers at all levels--federal, state, and local.

As later noted by McDonnell and McLaughlin, states have a dual compliance and program development role.[5] Adherence to and implementation of federal program regulations, such as monitoring or auditing, while necessary, is not sufficient to accomplish federal goals. States can go beyond this to involve substantive program planning and technical assistance to their local districts to improve programs.

The question remains, however, do the quality-oriented states either do a better job of managing their programs or have more effective programs than the compliance-oriented states? If the goal is to minimize audit exceptions or citations by the federal Monitoring Review Teams, perhaps a less risk-taking stance is called for, which would be taken by the compliance-oriented states. The quality-oriented states often break new ground, and they extend themselves by making rules to further program goals--all of which can lead to problems and uncertainties as to whether their actions are in compliance with the law.

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[5] McDonnell, L.M., & McLaughlin, M.W. Education policy and the role of the states. Santa Monica, CA: Rand Corporation, 1982.

It is assumed, here, that the greater attention paid by the quality-oriented states to ensuring program quality will, in the long run, pay off for the Title I children who are the beneficiaries of the program. They tried to implement the Title I law to the fullest as intended by Congress by exercising all of their state authorities. One of the ironies is that, since many of these states favor more state and local control of evaluation, they did not like the federal intrusion represented by the evaluation models. Hence, they did not spend much time improving the quality of their evaluation data. Thus, an examination of their statewide gains may not truly reflect their apparent quality management style.

One significant point that will be apparent in Parts Two and Three of this report is that a quality management style is not synonymous with greater administrative resources or larger numbers of staff. Attention to issues of program quality appear to be driven more by state socio-contextual factors and by the program managers themselves.

The study's major findings are discussed in Part Three of the report. The highlights from each of these chapters is presented below.

State Rulemaking Chapter Highlights

The 1978 Title I law codified long standing federal policy that states may issue their own rules, regulations, procedures, guidelines, or other requirements that are not inconsistent with any federal laws or regulations.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the rulemaking provisions included in the 1978 law (and the 1981 regulations):

- To what extent did the rulemaking provisions affect states' administrative practices?
- What problems did states encounter in exercising their rulemaking authority?
- Did the provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to make rules if this authority were not expressly permitted by law?

The results of the study show that ten states did not exercise their rulemaking authority; seventeen states, classified as minimal rule users, made rules primarily to clarify or interpret federal law for their districts; and twenty-two coordinators were classified as active rulemakers.

The study's major findings are:

- Active rulemakers tended to make informal rules even prior to the 1978 Title I law.

- Active rulemakers took the initiative more often in deciding when to make rules--their rules were initiated by the Title I unit rather than in perceived requests from district or federal personnel.

- Active rulemakers exercised their rulemaking authority to make rules to help districts design quality programs.

- Active rulemakers believed that the rulemaking authority strengthened their program administration.

- Active rulemakers indicated they would plan to continue to make rules even if no law allowed them to do so.

The management style of these active rule users was also characterized by successful use of the three-year application cycle to reduce paperwork for them and for their districts, active monitoring to ensure program quality but not as active generally to ensure program compliance, and more active use of personalized (rather than less personalized) technical assistance service delivery mechanisms.

Continuation of rulemaking activities under ECIA Chapter 1 would be difficult for some states if there is no express provision in the legal statute or regulations. States disagreed as to whether they had the authority to make and enforce rules if a provision were not expressly included in the legal framework. Even if the final Chapter 1 regulations permit rulemaking authority, the extent to which states can enforce their rules through use of various enforcement sanctions, withholding of payments for example, is unclear.

While all states wanted to be in control of their programs, some states' philosophies of "local control" will affect the extent to which their rulemaking authority can be exercised under Chapter 1. Nondirective states used the prescriptive 1978 Title I law to make their rules for them. With the less prescriptive Chapter 1 law, these "local control" states can not look to the law or regulations for guidance. They must decide if they wish to direct Chapter 1 through informal rules or leave program design powers up to their districts. These states may not be able to make rules, since they would be perceived as "directive" and perhaps counter to educational policy in their states.

Districts in the local control states had difficulties in differentiating state from federal rules. Some of the rules attributed to states, particularly Parent Advisory Council requirements, which were part of several prescriptive sections in the 1978 Title I, were also problematic for both states and districts. It is significant that these states were particularly sensitive to presenting a non-directive image, yet perhaps were unaware that some of their districts held them accountable for requirements they did not make.

Application Approval Chapter Highlights

In 1978, Congress gave states an opportunity to reduce paperwork by using a three-year application approval cycle. The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the application approval provisions included in the 1978 law (and the 1979 and 1981 regulations):

- To what extent did the application approval provisions, particularly the introduction of the three-year cycle, affect states' administrative practices?
- To what extent was the application approval process interrelated with other state responsibilities as intended by Congress?
- What problems did states encounter in implementing the provision?
- Did the provision stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to use application approval in the same way as is at present, if this authority were not expressly permitted by law?

The option to use a three-year application approval cycle has proven to be popular: 33 states use the three-year cycle. Making the three-year cycle "work," however, is a nontrivial matter. Eleven of these states felt that their paperwork and that of their districts had not been reduced by use of the cycle. Nineteen of these states, on the other hand, felt that paperwork was reduced for both them and their districts. Three states believed that the cycle had reduced paperwork only for their districts.

There is substantial variation in how states implemented the threeyear cycle, particularly how they handled the problem of annual updates. States that were successful in reducing their paperwork through use of the three-year cycle were characterized as having an active, problem-solving management style. These successful users of the three-year cycle can be characterized as follows.

- Successful users were especially clear in saying that a model application format would not be of value to them, since they already have in place a system that works.
- Successful users were likely to develop exemplary practices.
- Successful users enjoyed a more positive working relationship with the U.S. Department of Education.

The active management style of the successful users of the three-year cycle was also characterized by greater use of personalized (rather than less personalized) technical assistance service delivery mechanisms and greater activity in the use of parent involvement.

Under ESEA Chapter 1, Title I coordinators wanted to consider streamlining the application approval process to reduce districts' paperwork and to facilitate the approval process. While some coordinators wanted to rely more on assurances to achieve this goal, others strongly did not. Coordinators not wanting to use assurances felt that they would be unable to make the necessary compliance determinations required of them by law. Other states plan to reduce the application burden under Chapter 1 by continuing to use a consolidated application, which includes Chapter 1 in addition to other state and federal programs.

Some Title I coordinators were unsure whether they had the authority under Chapter 1 to include items on their application if they were not expressly provided by law.

All of these states believed strongly that the application approval process was extremely important. While they wanted to comply with the intent of Chapter 1, namely to reduce paperwork and administrative burdens on their districts, they were not generally desirous of trading rigorous collection of information on the application to be assured that their districts were in compliance for assurances, which would only provide simplicity of administration. Most, however, were willing to explore other ways (other than assurances) in which this goal could be met.

Monitoring Chapter Highlights

An important indicator of how each state views its relations to districts is the degree to which it uses its monitoring responsibility to help LEAs improve program quality in addition to using monitoring to ensure fidelity to the application and compliance with the law. The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the monitoring (including Monitoring and Enforcement Plan) provisions included in the 1978 Title I law (and the 1981 regulations):

- To what extent did the new monitoring provisions affect states' administrative practices?
- What problems did states encounter in implementing the provisions?
- Did the monitoring provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to monitor if this activity were not expressly required?

While all states said they used monitoring to ensure compliance, only 39 said that program quality was also monitored. Monitoring in compliance-oriented states was, in general, linked more closely with auditing than in the quality-oriented states. Quality-oriented states, on the other hand, generally tied technical assistance to monitoring; they used monitoring visits to identify areas in which technical assistance would be helpful to their districts. Compliance-oriented states are not especially active--even when they monitor for compliance, while quality-oriented states are active.

The study's major findings show that:

- While the compliance-oriented states tended to rely primarily on the application or monitoring checklists as the basis for monitoring, quality-oriented states developed more complex monitoring procedures.
- States focusing on monitoring to improve program quality tended to use content specialists in other units of the state agency or staff located in their regional offices to assist them in the review of program content in the monitoring process.
- During the monitoring process, the quality oriented states tended to visit Title I classrooms, interview teachers and students, and interview parents or Parent Advisory Council members.

The quality-oriented states were also successful users of the three-year cycle, and they tended to make rules to help districts design quality programs--all of which are characteristics of quality Title I administration. Thus, these quality-oriented states were active problem solvers and they tended to go beyond what is required by law to help achieve program quality.

All but three states indicated a desire to continue monitoring if there were no or lesser legal requirements for them to do so. The quality-oriented states planned to continue practices similiar to those conducted at present, while the compliance-oriented states planned to do less monitoring in the future.

Specific continuation plans under Chapter I will be affected by fewer dollar resources and fewer administrative staff. States may not be able to monitor as frequently or as intensely as they have in the past. New ways to monitor more effectively at low cost are sought. "Paper" monitoring is not viewed as a particularly viable option, since states felt they could not make the necessary determinations to assess program compliance. While the threat of monitoring, proposed by some, may be sufficient in the short term to maintain compliance and high program quality, some follow-through is needed to ensure future success and identity of the program.

States with quality-oriented attitudes were viewed by their districts as beng extremely helpful to them, while states with compliance attitudes were felt by their districts to be less helpful. Districts generally tended to be supportive of their states' monitoring efforts; almost all wanted their states to continue to monitor even if they were not required to do so by law.

Technical Assistance and Dissemination Chapter Highlights

Prior to 1978, the Title I statute only obligated states to provide technical assistance to LEAs for evaluation purposes. The U.S. Department of Education also funded ten Title I Evaluation Technical Assistance Centers (TACs) in 1976 to help states implement the evaluation provisions. The 1978 Title I statute clarified and expanded the state role in providing technical assistance and disseminating information. The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the technical assistance and dissemination provisions included in the 1978 law and 1981 regulations (and the impact of the Technical Assistance Centers):

- To what extent did these provisions affect states' administrative practices?
- To what extent did states change their practices as a result of the Title I law?
- What problems did states encounter in carrying out their technical assistance and dissemination efforts?
- Did the provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to provide technical assistance if this activity were not expressly required by law?

Technical assistance has a strong dual quality and compliance component: States used technical assistance to help their districts implement legal programs, and they also engaged in activities to help their districts improve their programs. Technical assistance was also highly interrelated with all of the other management responsibilities states have. For example, technical assistance was combined as part of the monitoring onsite visit; Title I staff provide assistance to their districts to complete applications, conduct evaluations, and involve parents.

The study's major findings are:

- The personalized methods of assistance--meetings with LEAs, conducting small-group workshops--consistently correlate with a "quality" management orientation; while use of less personalized services--statewide conferences, for example--correlate with more of a "compliance" orientation.

- A greater emphasis placed on providing technical assistance in the areas of evaluation and parent involvement as a result of the 1978 Title I law was associated with compliance attitudes. These states had not been active in these areas prior to 1978; hence their recent activities in these areas were conducted, in part, to become in compliance with the law.

- States that reported using their Technical Assistance Centers to help them integrate evaluation with program design were very active in evaluation, had a quality orientation that was expressed in monitoring and evaluation, and relied on personalized technical assistance methods--the profile of a "quality" management.

- Almost all states felt their Technical Assistance Centers were extremely helpful. However, they were divided as to whether they wanted the Technical Assistance Centers to retain their evaluation focus or to broaden to include curriculum or other areas. A few states felt that their Technical Assistance Centers had outlived their usefulness and should be terminated, since their TACs were associated only with implementation of the evaluation models.

Almost all states planned to continue providing technical assistance and dissemination under Chapter 1. However, fewer administrative funds and lack of a legal mandate may curtail a high level of activity in this area. While some states planned to scale down their present efforts or to rely more on the use of large-scale workshops, others were looking for effective--but low cost--methods of providing assistance. Since the personalized services are consistently associated with quality management activities, states may look to the U.S. Department of Education, their Technical Assistance Centers, or elsewhere for assistance in this area.

Districts tended to corroborate their states' reports of technical assistance provided. The more active providers of assistance apparently utilized more personalized services, while the less active states relied more on large-scale, more impersonalized, assistance methods.

Generally, districts were quite satisfied with the help they received from their states, and they wanted the assistance to continue even if states were not required by law to provide any.

Evaluation Chapter Highlights

Evaluation, defined broadly, had at least three components given to it by the 1978 Title I law and regulations. Districts had to evaluate the effectiveness of their programs through use of the Title I evaluation and reporting system (TIERS) models, they had to assess their programs over a period longer than the school year in which the program operated, and they had to demonstrate to their states that evaluation data were used to improve programs. The three-tiered administrative structure was apparent in these requirements. The federal role was to collect data in standardized formats (through TIERS) for national aggregation and reporting purposes; states were to collect and aggregate data to submit to the federal government, but they were also to ensure that districts used data to improve their programs; districts were to submit data to their SEAs, but they also had considerable flexibility in implementing the sustaining gains provision.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the evaluation provisions and the regulations on state practices. Because states dealt with evaluation in their state responsibilities--for example, they included evaluation sections in their applications, made rules on evaluation, monitored districts in the area of evaluation--evaluation was included in this study as part of state administrative activities. The impact of the evaluation provisions was assessed by obtaining answers to the following questions:

- To what extent did the evaluation provisions affect states' administrative practices?
- What changes were made to their administrative activities to implement the evaluation provisions?
- What problems did states encounter in implementing the evaluation provisions?
- Did the evaluation provisions stimulate states to develop practices or materials in this area?
- To what extent would states plan to continue to evaluate if this activity were not expressly required?

Some of the study's major findings are:

- Most states rated the provision on evaluation and the Title I law (section 124(g) as having substantial importance, but fewer than one-half of the states rated the sustaining gains provision (section 124(h) as having substantial importance.
- While not all states implemented the sustaining gains provision, the conducting of such activities tended to be associated with the attitude that evaluation was conducted for compliance with the law only.
- States' activities in evaluation were affected by their attitudes toward the purposes of evaluation (program improvement vs. accountability) as well as by the importance they attached to a federal, state, or local role in evaluation.

- States that were active in helping districts improve programs were characterized as having an active quality-oriented management style--they made rules to help districts improve programs, they monitored actively to ensure both compliance and program quality, they tended to use more personalized methods of providing technical assistance.

- Data utilization was often difficult, since states discovered that the TIERS data were not often useful at the local level. Only the more active states, however, tried to use TIERS data in a formative way; but they also encouraged the use of more general formative measures in addition to the summative TIERS measures.

- Despite the problems with TIERS, the states that worked hard to improve the quality of their TIERS data must have been able to overcome them more successfully. Their districts felt that they were much more helpful in providing evaluation help than the states that conducted few quality control activities.

- Almost all coordinators indicated they would plan to continue some sort of evaluation activities even if they were no longer required; and approximately one-third of the states indicated a desire to continue using the TIERS models.

While the TIERS models were mandated only since 1978, 19 states opted to implement TIERS prior to that time. The states that implemented the models early were more likely to plan to continue using the models under Chapter 1, even though they are no longer required. A concern held by a number of states is over the lack of program accountability now that ED will no longer be able to collect nationwide data through use of TIERS. If Congress is not aware of what is happening to Chapter 1 programs, states and districts fear that program funds will be cut even further, which will result in the demise of the program.

States, particularly those considering themselves to be nondirective, were concerned about whether or not they can mandate use of the models in their states if they are not required. Negative reactions from districts and state-level policymakers in these states may make continuation of the models under Chapter 1 difficult.

Many states perceived that Chapter 1 lacked a priority for evaluation. With reduced administrative funds and staff, states may be forced to place their limited resources on high priority management tasks, which may or may not be evaluation.

Parent Involvement Chapter Highlights

Parent involvement in Title I programs has evolved from a period when there were no requirements, through a stage when encouragement only was given, to 1978 when very specific stipulations on the nature of parent participation were in force.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to determine what effects this prescriptive piece of legislation had on state administration:

- To what extent did states implement--and help their districts implement--these parent involvement provisions?
- What problems did states encounter in implementing the parent involvement provisions?
- Did the provisions stimulate states to develop exemplary practices in this area?
- To what extent would states plan to continue involving parents if there were no or minimal requirements for them to do so?

The study's major findings include:

- Almost all states felt that parents should be involved in Title I programs in the form of parent participation as described in Section 124 of the 1978 Title I statute.
- Wholehearted support for the involvement of parents in advisory councils as specified by Section 125 of the statute come from only eight percent of the states. The states that tended to favor the councils were those in which the council requirements tended to be more compatible with their own local style of government--the involvement of parents in town councils, for example. The majority of states, however, felt that the goals of parent involvement could better be met with less formalized procedures.
- Attitudes toward parent involvement correlated positively with a quality management style as defined by monitoring actively to ensure program quality and use of personalized technical assistance methods of service delivery.
- States designating a staff person to handle parent involvement activities tended to be more active than states that did not.
- Section 125 (Parent Advisory Councils) created many more problems for state management than did Section 124 (parent participation).
- States with more positive parent involvement attitudes tended to develop exemplary practices or materials.

Most states planned to continue parent involvement under Chapter 1, but they differed as to whether they plan to take an active role at the state level or only encourage their districts in this area. The states assuming a more active role in parent involvement can be characterized as having a "quality" management orientation--they are more active in parent involvement and have more positive attitudes toward it, they actively monitor to ensure both program quality and compliance, and they tend to make rules to help their districts improve their local programs.

Districts generally felt that their states were helpful to them as they implemented the parent involvement provisions of the 1978 Title I law. Districts tended to mirror their states in having mixed feelings about whether councils are a most effective way of involving parents in the program, although almost all districts felt involvement of parents was important to the success of the program. Despite the negative attitudes toward councils expressed by some states, states did not allow these negative attitudes to interfere with their technical assistance roles.

Enforcement Chapter Highlights

Prior to the 1978 Title I statute, SEA enforcement sanctions were scattered throughout the Title I legal framework. Thus, state enforcement authority was unclear, which led to widely differing enforcement practices. Enforcement was defined by the State Management Practices Study to include audits and audit resolution, withholding of payments, and complaint resolution. The provisions for these enforcement sanctions (particularly auditing) are specified not only by the 1978 Title I statute and regulations but also by other applicable laws, regulations, and federal circulars and guidelines.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the audit, withholding, and complaint resolution provisions in the 1978 Title I law and subsequent regulations:

- To what extent did states implement these enforcement sanctions?
- To what extent did states change their enforcement practices as a result of these provisions in the 1978 law?
- What problems did states encounter in implementing the enforcement provisions?
- Did the enforcement provisions stimulate states to develop exemplary practices in this area?
- To what extent would states plan to continue these enforcement activities if there were no or minimal requirements for them to do so?

Some of the study's major findings are:

- While all states conducted fiscal audits, approximately only one-half of the states conducted program compliance audits. In a few states, monitoring served as the program audits. Uncertainty about whether program compliance audits were, in fact, required coupled with ED's differential enforcement of a state program compliance audit were the primary reasons for lack of state activity in this area.

- Independence of the auditor was a problem for states. Some coordinators were often not aware of their state's audit practices; others did not want to sound too knowledgeable about these activities else they might be criticized for not being independent enough. Some evidence suggests that, the greater the independence of the auditor, the less use of the audit findings by the state Title I staff.

- Districts tended to mirror their states' attitudes toward auditing--they tended to prefer fiscal audits to program compliance audits, in part, because the latter duplicated monitoring unnecessarily; and they felt that CPAs should not be used to conduct program compliance audits.

- While the 1978 Title I statute gave states the authority to withhold funds in cases of noncompliance, only one-half of the states reported never withholding funds. The most frequent enforcement sanction was a delay or suspension of funds to a particular district rather than demanding paybacks from the districts.

- Only nine states reported using compliance agreements, a new form of sanction recognized by the 1978 Title I statute. Other states that might have used compliance agreements did not do so, since they were unsure what this section of the statute really intended.

- Very few formal complaints were handled by states during the three-year period after the 1978 Title I statute was in place, and almost all complaints were resolved within the time periods specified by law. While states and districts still tended to receive and process complaints submitted "informally," these complaints were also few in number during the three-year period after 1978.

Under Chapter 1, states plan to continue enforcement sanctions as follows:

- Since program compliance audits will be required under Chapter 1, a transition to implementing these new procedures is currently in place in a number of states. However, almost one-half of the states would have preferred to use Chapter 1 monitoring staff--not auditors--to ensure accountability.

- Specific plans to withhold funds under Chapter 1 will depend, in part, on whether states feel they can extend their rulemaking authority provided in the Chapter 1 regulations to make a rule allowing them to withhold payments. While not all states used the withholding authority provided in the 1978 Title I law, many more felt that the "threat" of a withholding action was sufficient to keep districts in compliance with the law.

- Many states indicated that they would continue to use some sort of complaint resolution procedures under Chapter 1. Not all would keep complaint resolution procedures separate for Chapter 1 programs; reliance on existing state agency procedures to ensure consistency across all state programs was common. Increasing the flexibility of the requirements, including reliance primarily on informal rather than formal procedures, was also a frequent plan.

CHAPTER 1--A FORWARD LOOK

The Omnibus Budget Reconciliation Act (Public Law 97-35) was signed into law 13 August 1981. Chapter 1 of Title V, subtitle D, the Education Consolidation and Improvement Act (ECIA) of 1981 contains the intent of the former ESEA Title I program but with fewer prescriptions. The change to Chapter 1, which occurred during the midst of the Study of State Management Practices occasioned an opportunity to assess preliminary views of the new legislation. The results that pertain to the individual state responsibilities are discussed in Part Three of the report; more general reactions to the law from state policymakers are presented in Part Four of the report.

Some states applauded the flexibility of the new law. Many others, however, felt uneasy over the vague legal language, which they felt might lead to varying practices similar to those prior to 1978 and potential audit exceptions.

The U.S. Department of Education may be called upon to assist states under Chapter 1 in a number of ways. For example:

- In state rulemaking, clarification is sought in two major areas. First, to what extent can states utilize their rulemaking authority? If states wish to continue mandating the evaluation models or parent advisory councils, which are not required under Chapter 1, are they able to exercise their rulemaking authority to do so? Second, do states have enforcement sanctions, such as withholding of payments, that they can use to enforce compliance with their informally made Chapter 1 guidelines?

- In application approval, states are looking for streamlined applications to comply with the intent of Chapter 1 to reduce the paperwork burden. While a set of assurances may be one way of achieving this goal, some states were not desirous of trading the rigors of information collected in the application to ensure that their districts were in compliance with assurances, which only simplified state and local administration.

- In monitoring, some states went beyond what was minimally required by law to help their districts improve the quality of their local programs. This more intense monitoring, which is associated with a quality management style, may be affected by fewer dollar resources and fewer administrative staff under Chapter 1. New ways of monitoring effectively for program quality but at lower cost are sought. "Paper" monitoring was not viewed as a particularly viable option since states felt they could not make the necessary determinations to assess program compliance.

- In technical assistance, personalized service delivery mechanisms, such as small-group workshops or face-to-face consultations, are associated with a quality management style, while large-scale and less personalized assistance efforts are associated with a less active or compliance management style. However, fewer administrative dollars and lack of a legal mandate may make technical assistance a low priority for Chapter 1 management states. States are looking for effective, low cost, methods of providing the personalized services rather than relying on the large-scale impersonalized services.

- In evaluation, states are concerned over the lack of program accountability at the national level, since ED will no longer be able to collect data through use of TIERS. If Congress is not aware of what is happening to Chapter 1 programs, states and districts fear that program funds will be cut even further, which will result in the demise of the program.

  Since some states perceive that Chapter 1 lacks a priority for evaluation, they may not be able to conduct evaluations of the same level of effort as they did in the past. These states are interested in other ways of evaluating their programs, especially if they do not continue with the evaluation models.

- In parent involvement, some states are interested in the extent to which they can mandate parent advisory councils, since these states felt that councils were an effective way of involving parents. Most states felt that the involvement of parents in Chapter 1 programs was important, but they differed as to whether they felt they or their districts should be active in deciding what activities should be conducted. More effective ways of involving parents--in addition to or instead of councils--are desired by some states.

- In enforcement, more information and clarification of the audit provisions--specifically A-102P, involving the single audit concept, auditor independence, and the extent to which program compliance audits are required--is very much in need by most states.

PART ONE: Title I - Evolution of the State Role

Poverty has many roots, but the tap root is ignorance...Just as ignorance breeds poverty, poverty all too often breeds ignorance in the next generation...This is a national problem. Federal action is needed to assist the states and localities in bringing the full benefits of education to children of low-income families.

Lyndon B. Johnson
The White House
12 January 1965

What is clear is that the first year of administering Title I of ESEA dramatized one of the most troublesome issues in Federal-State relations: How to dispense Federal monies for categorical national purposes without undercutting the traditional and decentralized responsibilities of State and local officials.

Steven K. Bailey
Edith K. Mosher
1968

A state's role in federal policy implementation, then, is a dual function of its compliance response and program development concerns.

Lorraine M. McDonnell
Milbrey W. McLaughlin
1982

INTRODUCTION

Acceptance of the Federal Role

Title I of the "Act to strengthen and improve educational quality and educational opportunities in the nation's elementary and secondary schools," henceforth known as the Elementary and Secondary Education Act (ESEA), was signed into law in 1965 as Public Law 89-10. The law was later amended so that Title I services could also be provided to handicapped children (P.L. 89-13 in 1965); Indian children, agricultural migrant children, and children in institutions for the neglected and delinquent (P.L. 89-750 in 1966); and children of migratory fishermen (P.L. 93-380 in 1974). The last amendment, Public Law 95-561 in 1978, remained in effect until 1 July 1982, when it was superceded by Chapter 1 of the Education Consolidation and Improvement Act (ECIA) of 1981. The basic law had three fundamental purposes, which remained unchanged throughout its 16-year history. These are to:

- provide financial assistance to Local Education Agencies that have concentrations of children from low-income families,
- expand and improve educational programs for educationally deprived children residing in these low-income areas, and
- provide educational programs that are sensitive and responsive to the special needs of educationally deprived children.

The educational programs provided under the Title I law were highly visible to the public. Title I was the largest federally funded educational program in the United States; more than 6 million children in over 14,000 school districts received Title I services in school year 1980-81. More than $3.2 billion was allocated to Title I programs in school year 1980-81.

The Title I law specified the responsibilities and duties of educational agencies at the federal, state, and local levels and created a three-tiered administrative organization for the Title I program. The legislative branch of the federal government was responsible for writing and amending the legislation and appropriating funds to implement the legislation, while the executive branch, the Department of Education (ED) in this case, prepared the regulations to implement the requirements of the statute and distributed funds to the State and Local Education Agencies. Each State Education Agency (SEA) had the responsibilities of interpreting the statute for districts within its state, disseminating information about the requirements, providing technical assistance to districts on each of the program requirements, monitoring and enforcing Title I statutes and regulations, and reporting to the Secretary of Education on state as well as local Title I activities and practices. The design and delivery of Title I funded services to children was in the purview of the Local Education Agencies (LEAs).

The success of such a large and complex program depends, in part, upon its successful administration at the federal, state, and local levels. Previous studies found the relationships between the three levels of administration to be significantly intertwined. The Planar Corporation study, a multi-year investigation of Title I management practices at the federal, state, and local levels in 1973, found that (a) states are diverse in their administration of Title I programs, and (b) a complex relationship exists among the federal regulations, state administrative practices, and district implementation procedures (Briggs, 1973; The Planar Corporation, 1973).

In 1976, the National Institute of Education (NIE) conducted a large-scale study of the administration of compensatory education. NIE's research, in which federal regulations, guidelines, and interpretive rules were examined, showed that the federal legal framework for Title I was, for the most part, internally consistent and conformed reasonably well to the Title I statute. However, the NIE study further concluded that clarity of the Title I legal framework was as important as is internal consistency, and that if the legal framework is not clear, either as formulated or as communicated, SEAs and LEAs may deviate or develop wayward interpretations of Title I legislation (NIE, 1977; Gaffney, Thomas, & Silverstein, 1977). In recognition of the impact the federal administrative role has on SEA and LEA management practices in Title I, Congress, in 1978, directed specific changes to be made in the legal framework for Title I and to make the Title I administrative framework as clear and comprehensive as possible.

The Title I legislation in 1978 resulted in a much expanded role for states and greater administrative resources for carrying out some of these additional activities. Part Two of this report describes how the resources available for Title I programs are utilized. The particular responsibilities are described in detail in Part Three of this report. However, a retrospect analysis of these expanded requirements leads one to raise the question, what prompted Congress over the years to take a more prescriptive stance with states and their local school districts regarding Title I programs?

A look at the Title I program as it existed in the early years shows that states struggled with the translation of federal social goals into state and local goals. The idea that Title I was not general aid for districts but aid to a special needs population was difficult at first for states and districts to understand, and was a somewhat foreign concept at that time. The notion of a federal role addressing educational equity issues arising out of inequality based on race and class was discussed at length by Francis Keppel (1966), one of Title I's initial ardent supporters. Because of the nature of the educational system established by the Constitution, the federal role in education could not emerge alone; a system of state and local roles intertwined with the federal one was inevitable. Thus, the federal government authorized funds to be spent on particular children, and states were charged with accounting for the flow of funds and ensuring the intent of the program was met.

Sabatier and Mazmanian (1979) argue that a major statute seeking substantial departure from the status quo will achieve its objectives if five conditions are met:

- The program is based on a sound theory relating changes in target group behavior to the achievement of the desired end state.

- The statute contains unambiguous policy directives so as to maximize the likelihood that target groups will perform as desired.

- The leaders of the implementing agencies possess substantial managerial and political skills and are committed to the statutory goals.

- The program is actually supported by organized constituency groups and by a few key legislators.

- The relative priority of statutory objectives is not significantly undermined over time by the emergence of conflicting public policies or by changes in relevant socioeconomic conditions that may undermine the statute's theory or political support.

(Sabatier & Mazmanian, 1979,
pp. 484-485)

The Title I program met most of these conditions. Early congressional support for the Title I program stemmed, in part, from recognition of educational equity as a social goal worth working to achieve. Thus, to ensure that this goal was achieved, it was necessary for the statute to include procedures for targeting the funds to the appropriate districts, schools, and children and procedures for ensuring that the program be *supplemental* and not general aid. It was documented initially that states varied in their capabilities to administer such a large program (Murphy, 1973). Thus, it was not unexpected that Congress would attempt to clarify state roles--and federal roles as well--to facilitate smooth program management. As a result, the 1974 statute clarified and extended previous legislation; the 1978 law did the same.

Extension of the law by inclusion of options came as a result of a controversy that focused on the fifth condition listed above--namely the famous Quie vs. Perkins debates of the mid-1970s over the issue of whether Title I dollars should be targeted on the basis of educational rather than economic needs (see Vanecko & Ames, n.d., for an extensive analysis of the funding allocation issues). While the 1974 legislation remained unchanged, a few alternatives allowing selection on educational disadvantagement included in the 1978 legislation reflect the intensity of some of these earlier disagreements. This use of law "options" occurred several times in the 1978 legislation. It appears as though Congress attempted to anticipate all possible conditions that a local program might encounter in its implementation and to include a piece of legislation that pertains to them. The sections on schoolwide projects, noninstructional duties, alternative rankings of project school attendance areas, and continuation of eligibility for educationally deprived children tranferred to ineligible schools are all examples of activities LEA *may* (not *must*) elect.

Because early studies found that states and districts did not often implement the program as intended, the proponents of a strong federal role tended to look to the law itself for reasons. The massive NIE study concluded that the federal and state legal frameworks were unclear, which led to uneven interpretations by states. The lack of specific guidelines was viewed as contributing to noncompliance observed among states and locals--they were often unable to withstand local pressures to misuse the funds if there were no specific piece of legislation to fall back on. Thus, the writers of the Title I legislation continued to react to incidences of noncompliance by adding more prescriptions. The more prescriptions and options, they argued, the greater the flexibility states and locals have in administering the program.

Lack of guidelines was also believed to foster narrow interpretations of existing statute. The NIE study recognized that states occasionally overreacted and required their districts to adopt a more rigid interpretation of some provisions (e.g., requiring that LEAs design only "pullout" and never "inclass" instructional programs) in order to avoid audit exceptions (Burnes & Moss, 1978; Gaffney, Thomas, & Silverstein, 1977; Goettel, Kaplan, & Orland, 1977).

Thus, given the early history of the program, and the prevailing notion of a strong federal role, it is not difficult to trace the evolution of the Title I law from a mere 3 pages to approximately 50 pages.

Rationale for the State Management Practices Study

The American Institutes for Research (AIR) was funded in July 1980 by the Department of Education (ED) to conduct a two-year study to assess the effects of changes in the Education Amendments of 1978 on state management practices in ESEA Title I.

The major purposes of the study are to:

- document how states, through their Title I guidelines and management practices, met the requirements of the Title I law as amended in 1978; and

- identify exemplary state management practices and documents that can be disseminated and used by states to facilitate their management of Title I programs.

State management of Title I programs was studied by the Planar Corporation in 1973 and again by the NIE Compensatory Education Study in 1976-77. Findings from the NIE study, in particular, were used as the basis for making changes to the Title I law when it was reauthorized in 1978. The 1978 Title I law, as noted earlier, expanded and strengthened state management responsibilities in Title I. These changes and their impact on states is one focus of this study.

The major questions under investigation by the study of state management practices are:

- How did states meet the requirements of the 1978 Title I law?
- What changes and improvements to state management practices resulted from the increased administrative funding and the new administrative requirements of the 1978 Title I law?
- What problems were encountered by states as they implemented the 1978 Title I law?
- What innovative or successful practices were developed by states as they implemented the 1978 Title I law?

Emergence of a State Role

While Congress may have felt that the end product (as defined by the 1978 Title I law) was needed in its existing form, the reactions of states suggest that Congress went too far. Some states, by obeying the letter of the law, let the spirit die. They attempted to enforce parent advisory council requirements in all of their districts, for example, in spite of the fact that councils were practically impossible for many of their districts to form and in spite of the fact that they did not believe councils were an effective way to involve parents. Creative solutions were sought from SEAs, and then from ED, on how states and their districts could be "legal"--regardless of whether they currently had meaningful and effective involvement of parents in other ways.

While strict compliance measures were undoubtedly correct for a "young" program in which states simply carried out federal policy, it was not clear that such prescriptive measures were appropriate for a "mature" program, such as Title I in its later years. As noted by Elmore and McLaughlin:

> [C]ompliance activities undertaken in the early years of program implementation--for example, strict targeting of funds--help put a federal initiative in place. But, as a program matures, these compliance activities may support practice that is inconsistent with the spirit of federal legislation. Strict adherence to a federal targeting requirement, for example, may impede local efforts to develop effective compensatory programs. State and local officials can and have attempted to reconcile such inconsistencies in the federal position through marginally compliant measures. The federal government generally has responded to these moves by pouring still more resources into enforcing compliance activities. But, in the view of many state and local practitioners, this federal

> posture often runs counter to substantive congressional intent, especially for mature federal programs such as Title I...Hence, investments in compliance tend either to erode the credibility of the federal government or to require even greater investments to prevent erosion.
>
> (Elmore & McLaughlin, 1982,
> pp. 168-169)

States in the later years also appeared to become more resentful of the apparent negligence on the part of Congress to recognize the importance of state socio-contextual factors in the implementation of a large program, such as Title I. The State Management Practices Study noted major tensions that surfaced during interviews with state Title I coordinators--all pertain in some degree to the desire for greater local or state control, often at the expense of federal control.

States have rather deep-seated philosophies about the extent to which they adopt a "directive" or a "nondirective" posture in front of their districts. These philosophies can be set by the current education leaders in the state, such as the Chief State School Officers. A strong nondirective attitude may have been shaped by educational policymakers throughout the state's history. When both types of states attempt to implement a prescriptive law, several interesting outcomes are observed. First, some directive states appeared to resent federal intrusion into their domain. This attitude surfaced during discussions of state rulemaking, when several directive states indicated that they felt the federal government had intruded too far into their states' rights. They felt they had the right to make rules and they did not need the federal government to permit them to do so. These directive states may, also, have felt somewhat cheated by the numerous requirements, since numerous existing federal requirements made a directive posture less necessary for successful program administration. Some of the nondirective states, on the other hand, secretly applauded the prescriptions in the 1978 statute, because it gave them the opportunity to enforce the rules they were not able to make freely. When federal requirements matched state program goals, these nondirective states appeared to have no resentment toward the extent of the Title I legal requirements. The fact that several very vocal nondirective states did not "disown" the federal requirements or strongly differentiate for their districts state from federal requirements offers some support for this statement.

A second type of tension surfaced over attempts by states to fit the all-purpose legal requirements into their local situations. It was observed that parent advisory councils fit best in the eight percent of states with a history of such formal involvement; most other states preferred less strict arrangements to involve parents. Some districts had strong parent-teacher organizations or other local parent groups serving as their councils, even though they were not limited to the Title I program. States were occasionally forced to consider whether the intent of the law as perceived by states (that is, to have meaningful organized parent involvement at the local level) took precedence over the means to achieve that end or whether their districts had to comply with the letter of the law (including council composition and membership election)--even if it meant that local parent involvement would be weakened. Thus these states did not disagree with the federal goal of meaningful formal parent involvement, but they did resent the structure imposed on them by Congress to achieve this goal.

A third type of tension surfaced over the acceptance of the federal role in evaluation. Some states felt that evaluation was solely a local district activity; others felt that evaluation was a "local" activity in the sense that both states and their districts should be the primary initiators of the activity; while still others believed that, because of national program accountability, the federal government also had a role to play. These differing state attitudes toward the federal role influenced states' implementation of the federally mandated Title I evaluation models. States believing evaluation is solely a local concern appeared less than enthusiastic about the amount of effort required to implement the evaluation models. These states found the evaluation requirements particularly troublesome, perhaps, in part, because they were forced to play a role that they felt was inappropriate for them.

Thus, all three of these local-state-federal role issues affect implementation and administration of the Title I program. A challenge for this study was to arrive at a way of characterizing good management when taking these other factors into consideration.

Indepth examinations of how states implemented the 1978 Title I law show a consistent pattern displayed by some states to their management of Title I programs. They assumed a problem-solving stance in which they felt they should design their own materials and not rely on models produced by ED. These states adopted the three-year application approval cycle, and the cycle appeared to "work" for them and their districts by successfully reducing their paperwork as intended by Congress. These states actively monitored local programs by doing "extra" activities to ensure program quality; some were also active monitors to ensure program compliance; but they all had attitudes that the purpose of monitoring was to ensure program quality or both program quality and compliance, but never only to ensure compliance with the law. These states also tended to have very positive attitudes toward parent involvement; they also tended to be active at the state level conducting various parent involvement activities for their districts. These states provided large amounts of personalized technical assistance to their LEAs through face-to-face or small-group workshops rather than providing assistance in large-group settings, which are more impersonal.

The issues of local and state control blurs this picture somewhat when the state responsibilities of rulemaking and evaluation are concerned. To a less consistent degree, these same states also made rules to help their districts improve the quality of their programs and they actively helped their districts use evaluation data to improve their programs. An unexpected finding is the strong inverse correlation between activity in evaluation and parent involvement attitudes--high levels of evaluation activities are associated with negative attitudes towards parent involvement, particularly councils.

The states having this profile of activities are characterized as having a "quality" orientation toward management of their Title I programs. They present a contrast to those labeled as having a "compliance" orientation--they tend to be inactive generally throughout all areas of their state responsibilities, they like the idea of having ED develop models for different administrative activities, and they tend to favor less personalized methods of service delivery.

The quality-compliance issue has been addressed over the years. Congress, for example, in its report on the Education Amendments of 1978, was concerned over the comments made by states that compliance with particular requirements, namely implementation of the evaluation models, may not lead to meaningful data for program managers at all levels--federal, state, and local.

As later noted by McDonnell and McLaughlin (1982), states have a dual compliance and program development role. Adherence to and implementation of federal program regulations, such as monitoring or auditing, while necessary, is not sufficient to accomplish federal goals. States can go beyond this to involve substantive program planning and technical assistance to their local districts to improve programs.

The question remains, however, do the quality-oriented states either do a better job of managing their programs or have more effective programs than the compliance-oriented states? If the goal is to minimize audit exceptions or citations by the federal Monitoring Review Teams, perhaps a less risk-taking stance is called for, which would be taken by the compliance-oriented states. The quality-oriented states often break new ground, and they extend themselves by making rules to further program goals--all of which can lead to problems and uncertainties as to whether their actions are in compliance with the law.

It is assumed, here, that the greater attention paid by the quality-oriented states to ensuring program quality will, in the long run, pay off for the Title I children who are the beneficiaries of the program. They tried to implement the Title I law to the fullest as intended by Congress by exercising all of their state authorities. One of the ironies is that, since many of these states favor more state and local control of evaluation, they did not like the federal intrusion represented by the evaluation models. Hence, they did not spend much time improving the quality of their evaluation data. Thus, an examination of their statewide gains may not truly reflect their apparent quality management style.

One significant point that will be apparent in Parts Two and Three of this report is that a quality management style is not synonymous with greater administrative resources or larger numbers of staff. Attention to issues of program quality appear to be driven more by state socio-contextual factors and by the program managers themselves.

STUDY METHODOLOGY

To meet the study's objectives, three data collection efforts were designed. First, state documents and materials were reviewed to obtain one picture of state-level Title I management practices. Second, indepth telephone interviews were conducted with state Title I coordinators to ascertain specific information about state practices, problems, and plans for operating Title I programs. Third, onsite interviews were conducted with a sample of state Title I coordinators to follow-up on issues raised during the telephone interviews and with a sample of districts to obtain information on state management from a district perspective.

In the midst of the data collection, however, Chapter 1 of the Education Consolidation and Improvement Act of 1981 (ECIA) was passed. As discussed in Part Four, Chapter 1 retained the original intent of the program but lessens the program requirements. Thus, the study design was modified slightly to accommodate this change in the administrative priorities. Each of the three data collection efforts conducted by the study is described briefly below.

Document Review

All state agencies with Title I projects were contacted in December 1980 and asked to participate in this part of the study's data collection effort. The purpose of the document review was to assess state management practices through the forms, documents, and materials used by the states to meet their administrative requirements. Another purpose for examining the materials was to identify exemplary state management documents, practices, and materials that can be disseminated to interested states to help them meet their Title I requirements.

States were therefore asked to submit copies of the following materials to AIR staff:

- data collection forms and instructions, such as the district applications;
- pamphlets, newsletters, and other materials used to provide technical assistance to districts;
- policy documents, guidebooks, or handbooks;
- monitoring and auditing forms, checklists, and handbooks; and
- any other materials reports, and so on in the areas of fiscal accounting, accountability, and program design (including parent involvement).

States were also asked to provide information as to what types of materials they used from other sources--e.g., the Department of Education, other states, or other contractors.

While the documents were able to provide information to supplement the study's other two data collection efforts, their primary benefit came in meeting the second major goal of the study. From the results in Part Three in this report, exemplary practices were identified. Documents associated with these practices were identified as candidates for dissemination to states. Other materials were also identified as "exemplary" if they illustrated particularly innovative formats, contents, and ideas.

As Chapter 1 became more of a reality for states, some states indicated that reduced Chapter 1 budgets would translate into fewer staff. Loss of staff would also mean loss of knowledge about some past Title I practices. Thus, the states indicated they would be particularly interested in finding out what practices may have worked well in other states in the past so that they could use these ideas as a starting point for planning under Chapter 1.

Materials and documents were compiled in four major areas:

- application approval (Putman, 1982);
- monitoring (Appleby, 1982);
- parent involvement (Harrison, 1982); and
- enforcement (Putman, 1982).

Each of the four management modules produced contained three sections:

- an introduction that presented a brief discussion of legislative changes from Title I to Chapter 1,
- a brief summary of states preliminary continuation plans under Chapter 1, and
- the examples of state documents and materials considered "exemplary" by the study staff.

These modules are intended to provide interested states with some ideas, forms, materials, and practices that they can use to stimulate their planning under Chapter 1.

Telephone Interviews

Indepth telephone interviews were conducted with state Title I coordinators to:

- review state management systems and describe how states meet the requirements of the 1978 Title I law,
- document changes and improvements in their state administration resulting from the increased administrative funding and new administrative requirements of the 1978 Title I law,

- identify problems encountered by state administrators in their implementation of the 1978 Title I law,

- identify innovations or successful practices developed by the state administrators as they implemented the 1978 Title I law, and

- assess indirectly the importance of each legislated requirement by asking a speculative question as to whether states would continue particular practices if they were not required by law to do so.

The 51 Title I coordinators in state agencies (including District of Columbia) receiving Title I funds in 1980-81 were contacted and asked to participate in this aspect of the study's data collection effort; 49 of them agreed.

The states were queried using the five topic areas listed above about each of their major responsibilities:

- state rulemaking;

- application approval;

- monitoring and monitoring and enforcement plans;

- technical assistance and dissemination;

- evaluation;

- parent involvement; and

- enforcement, including audits and audit resolution, withholding of payments, and complaint resolution.

The findings from these indepth interviews in each of these areas are presented in Part Three of this report. To preserve the confidentiality of respondents, no state names are attached to any practices mentioned. Attempts were also made to delete references to states or situations within a quote that might identify a particular coordinator or state.

Onsite Interviews

The original purpose for the onsite interviews to a sample of state Title I offices was to follow-up on aspects of the telephone interview, including interviews with other individuals in the state Title I office. However, when Chapter 1 became a reality, these onsite interviews were used to follow-up items on the telephone interview for the purpose of assessing future continuation plans under Chapter 1.

A representative sample of 20 states was selected to receive onsite visits. The primary variables considered in the selection process include:

- geographic region of the country,
- concentration of population in metropolitan areas, and
- the amount of Title I allocations.

Secondary variables considered in the selection process include:

- number of LEAs in each state, and
- special features, such as presence of a state compensatory education program, schoolwide projects, or state-level parent involvement.

The 20 states selected using these criteria are: Arizona, California, Colorado, Delaware, Kansas, Louisiana, Massachusetts, Michigan, Mississippi, Missouri, New York, North Carolina, Ohio, Oregon, South Dakota, Texas, Utah, Vermont, West Virginia, and Wisconsin.

A summary of the distribution of states on each of the primary variables is presented below.

The number (N) of states in the nation in each classification is presented in the first column. In the second column, labeled proportional representation, is the number of states needed in the sample to reflect the actual distribution of states in the nation on each variable. The third column, labeled N of states in AIR's sample, lists the number of states in each classification selected to receive onsite visits. The numbers in the second column represent the sampling plan that would result from exclusive consideration of the primary variables. The third column represents the sampling plan that resulted from consideration of both primary and secondary variables.

- Variable 1: Title I Grant size

  In fiscal year 1981, Title I allocations to states ranged in size from $3,498,283 to $244,924,342. For purposes of description, the Title I grants were grouped into four classifications by size.

Title I Grant Size	N of states in Nation	Proportional Representation	N of states in AIR sample
$ 80 million and above	8	3	5
$ 40-80 million	14	6	6
$ 20-40 million	12	4	4
$ 20 million or less	17	7	5
TOTALS	51	20	20

- Variable 2: Geographic Distribution

The 10 Department of Education regional designations were used as a means to stratify states. The distribution of states in the sample mirrors the proportional distribution of states by region.

Geographic Location	N of states in Nation	Proportional Representation	N of states in AIR sample
Region 1	6	2	2
Region 2	2	1	1
Region 3	6	2	2
Region 4	8	3	3
Region 5	6	2	2
Region 6	5	2	2
Region 7	4	2	2
Region 8	6	2	2
Region 9	4	2	2
Region 10	4	2	2
TOTALS	51	20	20

- Variable 3: Concentration of Population

If more than 50 percent of the state's population resides in metropolitan areas, the state is classified as urban. Similarly, the state falls in the rural category if more than 50 percent of its population resides in non-metropolitan areas.

Concentration of Population	N of states in Nation	Proportional Representation	N of states in AIR sample
Urban	32	13	14
Rural	19	7	6
TOTALS	51	20	20

Personnel interviewed in these 20 states included the state Title I coordinators; other members of the state Title I office, such as evaluators (if any), parent involvement coordinators (if any), and auditors; the Chief State School Officer; and and intermediate level between the Title I unit and the chief (referred to here as a federal projects coordinator).

The following questions were asked of these individuals:

- What do states perceive as the strengths and weaknesses of the 1981 law? Specifically,
    - Has the 1981 law corrected problems that were created by previous Title I legislation?
    - What strengths of the 1978 law are missing from the 1981 law? What problems has the 1981 law created?

  - What necessary provisions have been missing from both the 1978 and 1981 Title I laws?

- How do states view federal, state, and local roles or responsibilities as a result of the 1981 law? Specifically,

  - Who at the state will help shape Title I management under the 1981 law?

  - How will the decrease in funds for state administration affect the state role?

  - How will the relationship between states and their districts change? How will the relationship between the states and ED change?

  - If the federal role is lessened, will states assume some of the responsibilities previously held by the federal government?

- Will states plan to manage the Title I program under the 1981 law in the same ways as they did under the 1978 law? Specifically, what plans have they made to continue approving LEA applications, state rulemaking, providing technical assistance, monitoring, resolving complaints, withholding payments, auditing, evaluating, and involving parents?

The results of these interviews focusing on Chapter 1 plans are presented in Part Four of this report. The follow-up to the continuation plans of the Title I office in each of the specific ares of responsibility are included in the appropriate discussions presented in Part Three of this report.

To obtain information on state management of the Title I program from a local perspective, up to five districts in each of the 20 states were contacted either onsite or by telephone. A total of 98 districts was included in this sample; 60 of them, 3 in each state, received onsite visits, and 28 were interviewed by telephone.

Two of the districts in each state were selected by the state Title I coordinator; three were selected by AIR staff independently of the state Title I coordinator. The independent LEA selections were made using allocation data collected by ED as required by Section 406A, General Education Provisions Act. The Title I coordinators were encouraged to select districts with substantially different Title I allocations and ones that typically received either substantial or minimal contact from the state Title I office. Some of the LEAs selected by the state in the former category included ones with numerous monitoring problems or ones that demanded considerable attention in the implementation of schoolwide projects. Some of the LEAs selected in the second category, for example, were ones that had no problems needing special attention by the state during the application approval or monitoring processes.

An attempt was made to visit LEAs with large, medium, and small allocations. The two LEAs selected by the coordinator were always visited. One independently selected LEA was also visited; the other two were interviewed by telephone. The LEAs selected to receive visits were also chosen in terms of "reasonableness." Since such a small number of LEAs were examined, visits to extremely small LEAs or ones that were difficult to travel to were felt to be neither cost-effective nor productive.

The district Title I coordinators were interviewed for approximately one-half day, if visited, or less than one hour, if telephoned, to ascertain their perspectives on how states administered the Title I program. Questions on the states responsibilities to districts, which complement those asked of state Title I coordinators during their initial telephone interviews, were asked. The longer amount of time onsite enabled questions on all of the seven state responsibilities to be asked; the telephone interviews focused on a subset of the management responsibilities (application approval, monitoring, technical assistance and dissemination, and auditing).

It was emphasized to the district Title I coordinators that AIR staff were interested in the district personnel's perceptions of the processes and procedures the state Title I office uses in the administration of the Title I program. Reactions to specific consultants at the state level were not solicited. AIR staff also emphasized that the data received would not be linked with individual persons in the district or with that district's name in any report or in any discussions with state Title I personnel.

The findings from the district interviews in each of the seven areas of responsibility are presented in the appropriate chapters in Part Three of this report. Two observations about the district interviews, however, warrant comment.

First, the reason for selection of some districts by AIR and some by the state Title I coordinators was, initially, to avoid having coordinators select all of their "best" districts or districts that would say the most complimentary things about their state offices. The results suggest, however, that districts did not appear to differ in their attitudes as a function of how they were selected. Rather, their size, as determined by their allocations or number of staff, or their distance from the state agency, in terms of how much personal help they were able to receive, were observed to be much more important factors. Furthermore, since so many topics were covered in these interviews, it was impossible for states to have selected districts that were positive in all areas. In only a few cases were districts observed to have no suggestions as to how their state Title I offices could improve in any area.

In several instances, the states themselves would probably be surprised to discover that their expectations about districts were not always met. In one case, for example, the state Title I coordinator, on hearing that a particular district was nominated for contact by AIR staff, commented that the district would probably be extremely critical of the state's efforts. In fact, this district turned out to be one of the efforts. In fact, this district turned out to be one of the state's most ardent supporters, because the state "allowed" the district to appeal decisions through the use of formalized complaint resolution procedures.

Second, district interviews were conducted initially, at least in part, to "verify" state management practices. That is, if states reported that they carried out particular practices, the districts could be used to verify the accuracy of such reports. However, it became obvious early on that this approach would lead to the same results as the exploration of the elephant by seven blind persons. Since districts did not take advantage of all of the workshops given by the states or read all of the literature sent to them by their states, they could not provide accurate verification. Furthermore, districts were not privy to the overall state management plan so they could not know how states targeted their technical assistance efforts--districts only saw the piece of action that included them. In some cases, however, districts had a larger perspective as they were aware of differing practices carried out by their state departments in other districts.

A good example of the lack of perspective held by districts is presented here for illustration. One medium-sized district, located at some distance from the state Title I office, believed that its state Title I office did not include parent involvement as one of its priorities. A visit to the state Title I office and discussions with the state staff, on the other hand, showed a very strong emphasis on parent involvement throughout the state department. The district perceived a lack of emphasis because no state staff ever criticized or suggested improvements in their parent involvement efforts on monitoring visits. As it turned out, the district was heavily involved in parent involvement activities, going beyond what the law required. There was no need for the state office to make suggestions on this aspect of the program, since it was considered exemplary; in fact, the state office included this district on the agenda of several of its state conferences to discuss the parent involvement component.

Despite these two comments, the value of the district interviews in this study is great. The districts provided very worthwhile information about what they liked and did not like about their states' activities plus ways in which their state office could change to improve the quality of district life. These comments are presented without much interpretation, because they are strong enough to stand alone. Consequently, each of the chapters on state practices in Part Three concludes with the district perspective.

PART TWO: Resources Available for Administration of ESEA Title I Programs

In 1965, state education agencies varied widely in their capacity to carry out their Title I tasks. A few states had the administrative structure and staff capable of establishing state education priorities and, occasionally, the political support and the will to go beyond federal priorities in implementing Title I vigorously. For most states, however, the administrative apparatus was weak and unable to exercise significant leverage over school policies. Inadequate staff capability and a strong tradition of localism promoted a general pattern of limited state educational leadership.

Jerome T. Murphy
1973

Accountability for use of funds and for program effectiveness need not be in competition with creative program leadership.

Robert T. Goettel
1978

States have carried and will continue to carry the principal responsibilities in program management. States differ in the amount of funds available for administration and in the ways they choose to use these monies. Since many of the most effective management strategies are labor intensive, some states have relatively low resources for carrying out these activities.

Donald W. Burnes
Richard L. Moss
1978

Introduction

Title I resources have been provided to state and local education agencies to strengthen and improve educational quality and educational opportunities for disadvantaged children in the nation's elementary and secondary schools. Both service and fiscal resources are targeted in areas that Congress has identified as being inadequately addressed by state or local agencies.

Generally, the purposes for providing service-oriented resources are to:

- provide technical assistance and information,
- build local and state capabilities in specific management areas, such as evaluation; and,
- support educational research and development.

Service-oriented resources include technical assistance and dissemination through the Department of Education, National Institute of Education, and programs sponsored by them. Service-oriented resources provide states and districts with expertise and information they might not otherwise have. One example is the ESEA Title I Technical Assistance Centers for Evaluation. Ten regional offices were established to assist states in implementing the Title I evaluation and reporting system and to strengthen state capabilities for evaluation. Auditing expertise is provided through the Department of Education's Office of the Inspector General. Publications are distributed through the U.S. Government Printing Office. The National Diffusion Network (NDN) and Joint Dissemination Review Panel (JDRP) provide services to states interested in identifying, validating, and implementing exemplary Title I projects. These services provide states with a systematic approach to locating exemplary Title I education practices in other states.

Fiscal allocations are targeted to populations that Congress felt were inadequately served by local and state funds in the past. Federal funds are intended to supplement local and state funds in providing services to special populations of disadvantaged students residing in low-income areas. In one program, Title I special incentive grants, Congress intended to stimulate state spending for compensatory education programs by giving additional fiscal incentives to LEAs located in states that provide state-funded assistance to meet the special education needs of educationally deprived children (P.L. 95-561, Section 116). This program, however, was never funded.

The following table illustrates how Title I funding has increased since the program's inception in 1965.

Table 1

Title I Funding Levels from 1966 to 1980

Fiscal Year	Level of Funding[a]
1966[b]	$ 746,904
1970[b]	1,170,355
1974[b]	1,460,058
1978[b]	2,129,400
1980[c]	3,215,343

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[a] Funding in thousands of dollars

[b] Source: U.S. Department of Health, Education, and Welfare, National Center for Education Statistics, Digest of Education Statistics, 1979, Washington, D.C., U.S. Government Printing Office, 1979, pp. 166, 172.

[c] Source: Education Funding Research Council, 1981 Title I Handbook, 1980, Washington, D.C.

Fiscal resources are allocated on the basis of specific funding formulae and are targeted for one of the Title I programs and uses: basic grants, programs for handicapped children, programs for neglected and delinquent children, programs for migratory children, concentration grants, and funds for state administration.

In school year 1980-1981, the federal government allocated the sums represented in Table 2 for Title I programs. Out of the total Title I budget for 1981, approximately $12.9 million or less than 0.5 percent was allocated to service-oriented evaluation activities and research studies, and almost $3.2 billion were allocated directly to states, the Bureau of Indian Affairs, insular areas, and local education agencies.

Of the total 1981 funds, 1.5 percent was allocated for state administration of the program. In accordance with Section 194 of P.L. 95-561, "Payments for State Administration," each state was to receive up to 1.5 percent of its total allocation to the state or a minimum of $225,000, expressly for state administration. In the case of Guam, American Samoa, the

Virgin Islands, the Northern Mariana Islands, and the Trust Territory of the Pacific Islands, the amount for the administrative setaside was set at $50,000.

The 1.5 percent setaside for state administration was a significant change over previous years in the funding for Title I. Since P.L. 89-10 in 1965, payments to states were limited to 1 percent of the total amount of the Title I allocation to each state per year. The increased amount for state administration was allocated to cover the increases in legislated state management responsibilities as a result of the 1978 Title I law.

State Allocations of Resources

As a prelude to the examination of state Title I management practices, information about each state's Title I budget, staffing, and organization, as well as other demographic data and information about special state characteristics, were assembled. Some information was collected from sources other than the state Title I coordinators, such as the U.S. Bureau of Census or National Center for Education Statistics. Table 3 lists the descriptive variables available for each state and summary statistics for these variables nationwide. Table 4 gives the correlations among the major population financial resources, and staffing variables.

These descriptive variables are included in the study of state management to describe characteristics of states and, possibly, associate these differences with particular management practices. For example, specific management practices may differ as a function of numbers of LEAs, numbers of Title I staff, or other state characteristics.

Included in Tables 3 and 4 is the derived variable--amount of state setaside per LEA. This measure was used by the NIE compensatory education study (1977) to measure the amount of resources available to a state while controlling for the number of LEAs the state must serve. As can be seen from Table 3, there is considerable variation on this variable; however, Table 4 indicates that it is not strongly related to other demographic variables, including numbers of professional and nonprofessional staff. Amount setaside is only moderately correlated with the number of professional staff (r = .36), number of LEAs (r =. 66), and the number of basic Title I programs (r = .66). Amount setaside is more strongly related to population variables (1980 population, number of Standard Metropolitan Statistical Areas [SMSAs] with more than 25,000 persons, and the number of SMSAs with more than 100,000 persons). Furthermore, none of these resource variables turns out to be strong predictors of state management practices examined in the main body of this report. Thus, although considerable variation on these variables exists, they do not turn out to be major explanatory variables.

The Importance of Legislated Responsibilities

State Title I coordinators were asked to rate the importance of each state responsibility and district program requirement as having "little," "moderate," or "substantial" importance in achieving the Title I program goals.

The results of the ratings for the state responsibilities are presented in Table 5. Approval of LEA applications, monitoring, technical assistance, and recordkeeping are all rated as very important in meeting the purposes of the Title I program, while monitoring and enforcement plans received a low importance rating.

Table 6 presents the ratings for the district responsibilities. Ranked high in importance are some key items associated with student selection, program design, the supplemental nature of the program, and evaluation. It is interesting to note that parent involvement is rated quite high, while parent advisory councils are given a much lower rating. Since only 10 states had schoolwide projects, it is therefore not surprising that schoolwide projects were rated as having little or no importance in meeting Title I goals.

Summary of Time Allocations

State Title I coordinators were also asked to specify the percentages of time that they and their staffs spent on each of their management responsibilities. Table 7 presents the means and correlations of these variables. It is evident from this table that Title I coordinators tended to spend a lot of time on monitoring, technical assistance, and approval of LEA applications--which were also ranked by the coordinators as high in importance (see Table 5). Relatively little time is spent on rulemaking, given its importance rating. This apparent discrepancy will be discussed in Part III of this report when actual state practices are described.

The amount of time spent on each state responsibility as a function of the rating it received is shown in Table 8. For example, the amount of time spent on reporting does not appear to differ whether it was rated as "little" or "substantial" in importance. On the other hand, states tended to spend more time in rulemaking, when it was rated as "substantial" in importance. For two of the major responsibilities, monitoring and technical assistance, states tended to spend approximately the same proportion of time regardless of whether the Title I coordinators rated the responsibility as "moderate" or "substantial" importance. For responsibilities that do not require major amounts of time, such as complaint resolution and withholding of payments, no trends are evident.

State Title I coordinators were asked to indicate the amount of time they and their staffs spent on the district requirements considering all of their state administrative activities. For example, in assigning an amount of time to funds allocation, the coordinators were told to consider all of the time spent in this area when they monitored, provided technical assistance, approved applications, and so on. They were also asked to indicate how much time they would ideally like to spend on those areas. These data are summarized in Table 9 and their intercorrelations in Table 10. Table 9 suggests that states tended to spend more time on funds allocation and targeting than they would like to spend, less time on program design than they would like to spend, and about the right amount of time on evaluation and parent involvement. It should be noted that program design, funds allocation, and targeting currently receive quite a lot of attention by Title I coordinators.

State Organizational Structures

Each state was characterized as having one of the following types of organizational structures for operation of Title I programs:

- Independent

  All functions, with the exception of auditing, have their primary focus of operation within the Title I unit. If one or two staff in other SEA units assist, they serve only in a supportive capacity.

- Independent with Regional Offices

  Regional offices are utilized by the independent Title I unit to help carry out its management responsibilities; for example, in the areas of monitoring, technical assistance, and application approval.

- Decentralized

  Some functions are carried out by staff paid for out of Title I funds, who are located in other SEA units. The primary focus of operation for these functions is within these other SEA units, not in the Title I unit. A frequently observed situation is the placement of the evaluation responsibility in a separate evaluation or research unit.

- Decentralized with Regional Offices

  Functions within the decentralized Title I unit are spread across regional offices and other SEA units.

Of the 49 states described here, 23 are characterized as independent, 13 as independent with regional offices, 8 as decentralized, and 5 as decentralized with regional offices.

With respect to state demographics, independent Title I units are smaller than decentralized states with respect to both population and financial resources. Independent units have smaller total allocations and thus have fewer funds for state administration than the other three types of organizational structures. They are smaller in population than the decentralized groups and they have fewer SMSAs of 25,000 or greater.

As was noted earlier in this chapter, a major finding of this study with respect to state demographics is that they do not play an important role in describing state management practices. Other factors, described in detail in the body of the report, are far more important. Demographic variables such as the number of LEAs and amount of state setaside do not consistently correlate with the general level of activity in the areas of parent involvement, monitoring, rulemaking, and evaluation, nor do they correlate with "quality" variables in these areas. The more potent explanatory variables are considerably more complex and are examined in detail in the following chapters.

District Allocations of Resources

A national sample of 98 districts located in 20 states was included in this study to obtain an indepth picture of state management practices from the recipients' point of view. To place their comments (in Part Three) in perspective, demographic data and descriptive information about these districts was collected. Table 11 lists the descriptive variables available for each district and summary statistics for the sample.

It is apparent from this table that the districts here range from extremely small (e.g., one public school with one Title I teacher and a $7,700 allocation) to extremely large (e.g., $11 million allocation). District size is definitely a factor when states plan their monitoring schedules or even their technical assistance activities. Serving greater numbers of LEAs or serving a few with the most concentrated numbers of students will make considerable difference to states, if they have limited staff and fiscal resources.

While the state Title I coordinators tended as a group to have eleven years of experience in the program, the district coordinators had considerably less (approximately four years). This supports states' perceptions that their districts tend to change Title I coordinators fairly often. As is reported in Part III, common complaints made by district staff pertain to the lack of information they receive from the state. If the local coordinators change fairly frequently, it is likely that state offices, especially those located at some distance from the LEA, will be unable to keep up with each new change of personnel. Problems are created on both sides--districts need information that they are unable to find and states are not yet aware of the need.

The Importance of Legislated Responsibilities

District Title I coordinators were asked to rate the importance of each district program requirement as having "little," "moderate," or "substantial" importance in achieving the Title I program goals.

The results of the ratings are presented in Table 12. Selecting children, conducting needs assessments, planning the program purpose and design, evaluating, and involving parents received high ratings by districts. They also tended to rate the supplemental nature of the program and the accountability programs high. These findings are not inconsistent with those shown for states in Table 6.

Problems with Legislated Responsibilities

District Title I coordinators were also asked to indicate whether district requirements created problems for them. A summary of the problems reported is presented in Table 13. These problem areas can be compared with those mentioned by states in each of the chapters on management responsibilities included in Part III.

Use of Data from District Practices Study

The districts used in this study were selected primarily to provide information on state management practices. While an attempt was made to identify districts varying in size within each state, the sample was not really large enough to permit many comparisons based on district size. An opportunity arose during the course of this study to obtain access to the data collected on a large representative sample of districts by another contractor, Advanced Technology, Inc., for purposes of examining district Title I management practices.

Two items in their interview are of interest here. Districts were asked to indicate, for each of the district legislated requirements,

- which are the most/least necessary for attaining the objectives of the program? and
- which of the requirements are the most burdensome or require the most paperwork?

Of the 10 legislated responsibilities selected, districts were to rank them from 1 (most necessary) to 10 (least necessary) and from 1 (most burdensome) to 10 (least burdensome). These terms relate to the importance ratings collected as part of the State Management Practices Study but with the addition of a nationally representative sample. These data are presented in Tables 14 and 15.

Two items are of particular interest to the State Management Practices Study--parent involvement and evaluation--both of which are discussed in separate chapters in Part Three of this report. It is of interest to note that small districts report that the parent involvement provisions are more of a burden than do larger districts. This questionnaire item did not differentiate parent participation as represented by Section 124 from advisory councils as represented by Section 125. The results from the State Management Practices Study (see Part Three), however, would suggest that the difference in perceived burden is attributed to the difficulties of small, more rural, communities in implementing the council requirements. This observation is also supported by the District Practices Study data, as their non-metropoliltlan districts rated the parent involvement requirements as more burdensome than did the central cities or urban fringe districts.

The other item, evaluation, is of interest in part because the District Practices Study found that the ratings of burden did not appear to differ as a function of district characteristics. While there appears to be a tendency for small, non-metropolitan districts to feel the evaluation requirements are more burdensome, it is not clear if these differences are large enough to be significant. Their data do suggest, however, that size is an important factor when considering the necessity ratings--small districts tend to feel that evaluation is more necessary than do the largest cities. These results on evaluation are supportive of the conclusions noted in this report--namely that the formal TIERS data may not be useful for improving programs in small districts, which would create more of a burden for them than for large districts. These small districts could still feel that evaluation is necessary, even though the way part of it is implemented may appear burdensome. These issues are discussed in more detail in Part Three.

TABLE 2 [a]

1980-81 TITLE I FUNDING

Allocation by State and by Purpose

	Basic Grants Local Educational Agencies	Handicapped	Juvenile Delinquents	Adult Correctional Institutions	Neglected	Migrant	Concentration Local Educational Agencies	State Administration	Total
TOTALS	2,633,328,347	165,000,000	19,757,103	11,092,427	1,342,175	245,000,000	98,323,121	48,318,628	3,215,343,000
Percents	82	5	0.6	0.3	0.08	8	3	1.5	100
ALABAMA	68,357,387	611,811	177,990	50,069		963,063	2,512,471	1,090,091	73,767,875
ALASKA	4,896,029	1,641,512	95,949			98,729	250,000	225,000	7,189,229
ARIZONA	24,509,866	601,134	238,963	93,502		6,122,899	993,578	638,468	33,086,590
ARKANSAS	39,332,409	2,385,281	166,795	132,381		4,477,738	1,219,327	717,650	48,561,045
CALIFORNIA	299,924,342	2,789,014	2,124,233	450,325		14,023,314	12,837,674	4,757,560	321,928,260
COLORADO	25,249,777	2,328,302	238,370	67,781		2,982,399	627,979	649,835	31,792,272
CONNECTICUT	23,898,929	2,046,456	77,816	373,996	20,863	2,679,820	993,252	650,054	30,307,901
DELAWARE	6,569,142	1,751,965	144,026	113,391		866,579	250,000	225,000	9,920,818
FLORIDA	87,340,147	1,758,819		679,635		16,628,360	3,077,176	1,601,202	108,348,080
GEORGIA	74,398,109	1,277,289	365,432	393,268		2,422,310	2,264,497	1,228,321	82,843,811
HAWAII	9,163,163	801,852	39,771	11,454			393,341	225,000	10,636,591
IDAHO	6,213,148	280,335	63,141	23,720		3,136,292	250,000	225,000	10,171,537
ILLINOIS	112,322,918	20,376,691	302,572	220,658		1,371,966	6,812,645	2,106,323	142,541,456
INDIANA	33,885,683	3,385,135	490,248	231,345	171,357	1,036,679	366,423	595,842	40,318,607
IOWA	24,412,220	817,838	120,479	132,331	40,060	237,344	250,000	380,439	26,393,[illegible]
KANSAS	19,675,446	1,107,453	346,373	61,346		1,051,190	250,000	336,383	22,676,600
KENTUCKY	53,499,187	1,247,235	460,550	75,613		3,916,875	1,623,377	817,972	61,777,852
LOUISIANA	78,003,444	3,023,443	555,916	60,159		4,636,062	3,058,026	1,337,926	90,533,026
MAINE	9,938,417	744,029	117,336	39,492		3,751,686	250,000	225,000	15,080,980
MARYLAND	45,364,063	2,621,522	634,016	260,032		885,001	1,620,647	772,518	52,289,824
MASSACHUSETTS	48,519,938	10,143,298	270,346	263,035		5,873,833	2,097,111	1,008,802	68,267,361
MICHIGAN	109,395,421	7,947,444	681,710	876,476	16,182	6,463,030	4,275,740	1,951,397	132,044,580
MINNESOTA	37,726,323	621,907	750,372	137,953		1,967,552	697,710	617,775	41,799,443
MISSISSIPPI	65,742,729	640,396	199,683	101,788		3,069,606	2,585,967	1,085,210	73,412,608
MISSOURI	50,246,642	1,726,623	195,619	112,231		1,409,783	1,642,699	801,362	56,237,396
MONTANA	8,806,753	327,131	120,871	17,259		838,309	250,000	225,000	10,603,778
NEBRASKA	14,770,536	327,096	106,448	56,275	18,984	639,833	250,000	239,537	16,208,707
NEVADA	3,688,283	370,848	172,587	29,822		346,156	250,000	225,000	4,882,694
NEW HAMPSHIRE	4,039,847	1,808,725	91,023	11,237			250,000	225,000	6,425,842
NEW JERSEY	66,237,640	5,550,273	795,066	99,276		3,153,647	2,426,691	1,173,488	79,406,091
NEW MEXICO	22,135,029	783,332	209,718	76,532		2,476,783	675,369	387,133	26,196,096
NEW YORK	242,619,759	15,346,640	2,062,361	1,697,882		6,287,850	12,424,579	4,172,339	285,341,607
NORTH CAROLINA	79,646,298	2,337,993	559,088	797,943		6,767,684	2,085,062	1,386,318	93,796,386
NORTH DAKOTA	7,399,282	296,210	52,316	16,759		750,336	250,000	225,000	9,190,532
OHIO	82,849,825	6,999,189	946,206	151,687	176,857	1,712,136	2,378,533	1,398,014	96,398,969
OKLAHOMA	31,832,385	978,137	186,763	147,996	240,744	1,941,259	813,781	561,405	36,635,151
OREGON	22,993,027	3,211,498	253,046	169,878		5,073,925	372,735	489,362	33,113,519
PENNSYLVANIA	117,284,398	10,519,241	610,996	395,948	276,470	2,279,766	3,736,599	2,026,551	137,130,071
RHODE ISLAND	9,211,127	511,576	42,857	35,819			295,403	225,000	10,321,935
SOUTH CAROLINA	52,362,175	877,276	522,391	407,153	97,338	633,359	1,600,360	848,706	57,429,006
SOUTH DAKOTA	8,276,396	283,998	49,306	39,412		30,957	250,000	225,000	9,386,817
TENNESSEE	63,202,123	785,499	468,325	187,936	214,145	327,325	2,112,158	1,099,460	68,306,383
TEXAS	174,005,608	7,868,773	772,531	525,860	156,378	63,151,850	6,915,473	3,797,935	259,991,508
UTAH	8,513,517	824,596	99,345	5,488		130,487	250,000	225,000	10,066,746
VERMONT	4,429,116	1,273,867	65,838	23,333		273,324	250,000	225,000	6,319,678
VIRGINIA	56,956,272	1,678,956	617,738	787,740		766,292	1,226,412	919,150	62,956,530
WASHINGTON	31,921,410	1,271,348	374,205	230,456		9,272,039	799,364	667,815	45,138,857
WEST VIRGINIA	27,929,945	549,676	175,398	81,763	18,407	205,921	636,309	443,916	30,038,237
WISCONSIN	44,561,742	2,098,964	332,536	158,522		1,477,311	795,318	736,398	49,309,107
WYOMING	3,340,385	620,434	68,876	15,936		345,374	250,000	225,000	5,137,103
DISTRICT OF COLUMBIA	14,636,359	2,296,313	146,966	176,377	102,271	2,327	683,358	270,705	18,317,754
AMERICAN SAMOA	1,497,877							50,000	1,547,877
GUAM	1,382,511	202,931						50,000	1,835,442
PUERTO RICO	107,447,094	643,145	319,561	157,570		[illegible]	7,035,768	1,596,593	116,202,916
TRUST TERRITORY	6,842,312							50,000	6,592,312
VIRGIN ISLANDS	3,292,350	255,260						50,000	3,393,610
NORTHERN MARIANAS	633,062							50,000	683,062
BIA	20,179,238								20,179,238
EVALUATION & STUDIES									12,350,000
[illegible]									31,251
MIGRANT ACTIVITIES						6,000,000			6,000,000

a Source: Education Funding Research Council, 1981 Title I Handbook, 1980, Washington, D.C.

Table 3

Statistical Summaries of Descriptive Information about States

	N	Median	Inter-Quartile Range[1]	Quartile 1[2]	Quartile 3[3]	Range Low	Range High
1980-81 Basic Title I Grant	49	33,885,648	28,209,450	9,584,755	66,003,656	3,540,873	254,923,696
1980-81 Total Title I Allocation	49	41,799,392	31,539,337	10,518,878	73,597,552	5,132,050	321,926,656
State Administrative Set-aside	49	617,723	432,544	225,000	1,173,483	255,000	4,757,550
State Setaside per LEA	49	3,664	2,461	1,861	6,783	625	31,531
Other Administrative Funds	46	0	0	0	0	0	594,571
1980-81 Administrative Funds: % spent on staff	42	80.0	7.5	72.0	87.0	45.0	100.0
1980-81 Administrative Funds: % spent on nonstaff	42	20.0	7.5	13.0	28.0	0	55.0
1978-79 Revenues: % Federal	49	9.2	.3	6.4	12.3	3.7	18.2
1978-79 Revenues: % State	49	47.5	10.1	36.9	57.2	9.7	81.4
1978-79 Revenues: % Local	49	41.5	12.9	31.5	57.4	2.6	83.8
1980 Population (thousands)	49	3,108	2,081.5	1,300	5,469	400	23,669.4
Number of places with population >25,000	49	13.5	8	7.5	23	1	150
Number of places with population >100,000	49	2	1	1	4	0	21
Population density (persons per sq. mile)	49	77.39	59.1	28.5	147.3	1.2	935
Mean expenditures per pupil	49	1,515	233.5	1,281	1,749	1,003	3,655
1980-81 Number of LEAs	49	186	169	92	430	7	987
1980-81 Number of LEAs ($0-$50,000)	44	75	109.75	14	233	0	489
1980-81 Number of LEAs ($50,000-$100,000)	44	30.5	34.5	11	80	0	379
1980-81 Number of LEAs ($100,000-$500,000)	44	38	30.75	13	74.5	1	198
1980-81 Number of LEAs ($500,000-$1,000,000)	44	3.5	4.5	2	11	0	38
1980-81 Number of LEAs ($1,000,000-$5,000,000)	44	3.5	2.25	1	5.5	0	24
1980-81 Number of LEAs (>$5,000,000)	44	0	.5	0	1	0	3
1980-81 Number of Basic Title I Programs	49	180	160	92	413	7	987
1980-81 Number of Title I Neglected or Delinquent Programs	46	8	11	3	25	1.0	241
1980-81 Number of Title I Migrant Programs	47	13	16.5	4	37	0	352
1980-81 Number of Private Schools in Title I	38	26.5	41	18	100	0	254

Table 3 (continued)

	N	Median	Inter-Quartile Range[1]	Quartile 1[2]	Quartile 3[3]	Range	
						Low	High
Number of Professional Title I Staff	49	8	4	5	13	3	40
FTE Professional Title I Staff	49	7	4.5	4	13	2	40
Number of Non-professional Title I Staff	49	4	1.5	3	6	1	15
FTE Non-professional Staff	49	4	2.5	2	7	1	15
Number of Evaluators from Other SEA Units	48	1	.5	0	1	0	10
FTE Evaluators from Other SEA Units	47	.02	.5	0	1	0	10
Number of Fiscal Staff from Other SEA Units	47	1	1.5	0	3	0	25
FTE Fiscal Staff from Other SEA Units	46	.5	1	0	2	0	25
Number of Auditors from Other SEA Units	47	1	1	0	2	0	12
FTE Auditors from Other SEA Units	45	0	1	0	2	0	11
Number of Curriculum Staff from Other SEA Units	47	0	.5	0	1	0	16
FTE Curriculum Staff from Other SEA Units	47	0	.02	0	.05	0	8.5
Number of Monitors from Other SEA Units	47	0	0	0	0	0	16
FTE Monitors from Other SEA Units	47	0	0	0	0	0	16
Number of Administrators from Other SEA Units	47	0	.5	0	1	0	5
FTE Administrators from Other SEA Units	47	0	.005	0	.01	0	3
Number of Others from Other SEA Units	48	0	0	0	0	0	0
Number of Years of Title I Coordinator's Experience	49	11	4	7	15	2	16
Number of Regional Title I Offices	49	0	1.5	0	3	0	27
Number of Professional Regional Staff	46	0	1.5	0	3	0	33
FTE Professional Regional Staff	46	0	1.5	0	3	0	32.5
Number of Non-professional Regional Staff	46	0	.5	0	1	0	17
FTE Non-professional Regional Staff	46	0	.25	0	.5	0	12

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[1] (Quartile 3 - Quartile 1):2

[2] 25th percentile

[3] 75th percentile

Table 3 (continued)

Selected Characteristics of the States

Characteristic	No	Yes
State Compensatory Education Program	31	18
Minimum Competency Testing	25	23
State Title I PAC	34	15
State Title I Parent Involvement Coordinator	17	32
State Parent Advisory Group	38	11
SEA Parent Involvement Coordinator	44	5
Private School Bypass	45	2
Use of Computers in Evaluation	9	40
Use of Computers in Fiscal Areas	9	40
Use of Computers in Other Areas	30	16

Primary Grade Levels Served	Number of States
• Elementary (1-6)	23
• Pre-School and Elementary (Pre K-6)	20
• Middle School (4-8)	2
• All Grades (Pre K-12)	4

Table 4

Correlations among State Demographic Variables[a]

	1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
1. Setaside per LEA												
2. Setaside Funds	.08											
3. Title I Basic Grant	.09	.99										
4. Title I Total Grant	.08	.99	.99									
5. Number of LEAs	-.41	.66	.63	.66								
6. Number of Basic Title I Programs	-.41	.66	.64	.66	.99							
7. 1980 Population	.05	.96	.96	.96	.69	.69						
8. Places Greater than 25,000	-.01	.77	.75	.77	.57	.57	.85					
9. Places Greater than 100,000	.05	.78	.77	.78	.45	.45	.84	.85				
10. Population Density	.12	.15	.16	.15	.09	.11	.22	.38	.14			
11. Number of Professional Staff	.03	.36	.36	.37	.44	.44	.32	.27	.16	.25		
12. Number of Nonprofessional Staff	.07	.45	.44	.45	.45	.44	.40	.32	.29	.26	.66	
13. Years Expertise of State Title I Coordinator	-.22	.24	.26	.25	.38	.37	.22	.07	.09	-.14	.15	.16

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[a] Correlations of approximately .4 or greater are statistically significant at the p=.05 level.

Table 5

State Importance Ratings of Legislated State Responsibilities[a]

			Frequencies		
	N	Mean	Little Importance	Moderate Importance	Substantial Importance
Approval of LEA Applications	48	2.89	0	5	43
Monitoring	48	2.83	1	6	41
Technical Assistance/Dissemination	47	2.76	1	9	37
Recordkeeping/Fiscal Controls	43	2.74	0	11	32
Prohibition of Federal Aid	46	2.39	10	8	28
Audits/Audit Resolution	48	2.14	11	19	18
Access to Information	44	2.09	10	20	14
State Rulemaking	47	2.06	12	20	15
Withholding of Payments	48	2.02	15	17	16
State Application	38	2.00	12	14	12
Reporting	47	1.96	13	23	11
Complaint Resolution	47	1.72	18	24	5
MEPs	44	1.59	24	14	6

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[a] The scale is as follows:
1 = Little or no importance in meeting the Title I goals
2 = Moderate importance in meeting the Title I goals
3 = Substantial importance in meeting the Title I goals

Table 6. State Importance Ratings of Legislative District Requirements

			Frequencies		
	N	Mean	Little Importance (1)	Moderate Importance (2)	Substantial Importance (3)
Funds Allocation					
Supplement Not Supplant	48	2.75	19	13	16
Excess Costs	46	1.97	14	19	13
Maintenance of Effort	48	1.94	1	10	37
Comparability	48	1.87	17	20	11
Targeting and Eligibility					
Children To Be Served	47	2.98	0	1	46
Private School Participation	47	2.34	7	17	23
Designating School Attendance Areas	44	2.23	10	14	20
Schoolwide Projects	44	1.27	36	4	4
Program Design and Planning					
Assessment of Educational Need	48	2.90	1	3	44
Purpose of Program	47	2.72	4	5	38
Control of Funds	47	2.72	3	7	37
Accountability	46	2.72	3	7	36
Sufficient Size Scope Quality	46	2.50	6	11	29
Planning	47	2.45	8	10	29
Teacher/School Board Participation	47	2.30	9	15	23
Training of Aides	47	2.30	6	21	20
Other Program Coordination	48	2.21	9	20	19
Individualized Plans	47	1.93	16	18	13
Ranking of Project Areas	48	1.92	13	26	9
Information Dissemination	47	1.91	12	27	8
Noninstructional Duties	46	1.80	21	13	12
Jointly Operated Programs	47	1.79	20	17	10
Complaint Reduction	47	1.76	18	22	7
Construction	45	1.44	31	8	6
Evaluation					
Evaluation	47	2.78	1	8	38
Sustaining Gains	46	2.20	10	17	19
Parent Involvement					
Parent Participation	47	2.63	3	11	33
Parent Advisory Councils	47	1.78	20	17	10

Table 7

Percent of Time Spent on Legislated State Responsibilities and Correlations among Responsibilities[a]

% Time on:		Mean	S.D.	Correlations										
				1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.
1.	Approval of Application	20.00	8.43											
2.	State Rulemaking	2.67	2.95	-.05										
3.	T.A. and Dissemination	22.47	10.42	-.22	-.05									
4.	Monitoring	28.20	11.50	-.21	-.14	-.29								
5.	Complaint Resolution	1.37	2.19	-.27	.20	-.23	.01							
6.	Withholding Payments	.81	1.25	.05	.07	-.18	.14	.33						
7.	Audits/Audit Resolution	6.25	7.07	-.26	-.18	-.14	-.26	-.01	-.19					
8.	Other	2.72	4.45	.08	-.05	-.36	-.09	.08	.26	-.12				
9.	SEA Application/MEP	2.20	2.00	-.12	.37	.14	-.43	.18	.01	-.23	.18			
10.	Reports	4.44	4.13	-.26	-.02	.14	-.42	-.02	-.10	-.03	-.05	.53		
11.	Recordkeeping	7.78	5.08	-.07	-.08	-.37	-.23	.16	-.31	.28	-.07	-.15	.11	
12.	Secretary - Other	1.01	2.03	.11	.26	-.32	-.24	.08	-.09	-.05	.21	.25	.14	.18

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[a] Correlations of approximately .4 or greater are statistically significant at the p=.05 level.

Table 8

Time Spent on States' Management Responsibilities as a Function of Perceived Importance

Perceived Importance		State Management Responsibility						
		Approval of Applications	State Rulemaking	Technical Assistance	Monitoring	Complaint Resolution	Withholding of Payments	Audits/ Audit Resolution
Little Importance (1)	Mean	–	1.33	10.00	25.00	1.41	.50	3.75
	(S.D.)	0	(1.72)	(0.00)	(0.00)	(2.40)	(1.40)	(3.78)
	N		12	1	1	16	14	10
Moderate Importance (2)	Mean	13.40	2.10	22.78	30.00	1.35	.81	10.00
	(S.D.)	(5.03)	(2.66)	(11.98)	(3.54)	(2.24)	(1.10)	(9.14)
	N	5	19	9	5	23	16	19
Substantial Importance (3)	Mean	20.75	4.23	22.90	28.19	.72	1.01	3.62
	(S.D.)	(8.55)	(3.14)	(10.32)	(12.42)	(.41)	(1.29)	(3.25)
	N	40	13	34	39	5	15	16

Table 9

Percent of Time Spent on District Requirements

		Actual		Ideal		Ideal-Actual	
	N	Mean	S.D.	Mean	S.D.	Mean	S.D.
Funds Allocation	43	17.66	11.03	11.36	8.38	-6.30	8.86
Targeting and Eligibility	43	20.25	10.38	16.17	9.02	-4.08	7.42
Program Design	43	29.21	14.26	39.07	16.21	9.86	12.77
Evaluation	43	13.94	6.19	14.59	6.54	.56	5.41
Parent Involvement	43	12.48	6.70	12.02	7.43	- .46	6.58

Table 10

Intercorrelations of Percent of Time Spent on District Requirements[a]

		1.	2.	3.	4.	5.	6.	7.	8.	9.
Actual										
1.	Funds Allocation									
2.	Targeting & Eligibility	.11								
3.	Program Design	-.48	-.26							
4.	Evaluation	.08	-.13	-.34						
5.	Parent Involvement	-.25	-.32	.03	.16					
Ideal										
6.	Funds Allocation	.61	.19	-.28	-.01	-.15				
7.	Targeting & Eligibility	.22	.72	-.20	-.04	-.24	.38			
8.	Program Design	-.24	-.09	.65	-.30	.06	-.32	-.25		
9.	Evaluation	.13	-.16	-.27	.64	.09	-.14	-.11	-.42	
10.	Parent Involvement	-.08	-.11	-.05	.36	.57	-.33	-.27	-.02	.28

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[a] Correlations of approximately .4 or greater are statistically significant at the p=.05 level.

Table 11

Statistical Summaries of Descriptive Information About Districts

	N	Mean	Std. Dev	Low	High
Funding - 1980-81					
Size of District Grant	94	Mean=933,827 Median=275,000		7,700	11,000,000
Percent of District Budget that Title I Funds Contribute	63	4.1	3.9	0.3	21
Participants - 1980-81					
Number of Students (Total) in District	93	13,768	22,964	113	110,000
Number of Title I Students					
Public School	94	1,626	3,545	20	23,000
Private School	45	189	504	2	3,090
Total	94	1,715	3,785	20	24,000
Title I Attendence Centers					
Number of Title I Public Schools	94	17.2	29.9	1	190
Number of Private Schools Participating in Title I	43	5.1	7.7	1	36
Number of Grade Levels Served	93	9.3	3.6	3	14
Staff in Title I Projects					
Number of Title I Teachers	84	24.8	53.4	1	315
FTE of Title I Teachers	86	24.8	53.6	.7	315
Number of Staff Aides	82	26.8	62.9	1	396
FTE of Title I Aides	85	24.7	60.4	.4	396
Number of Evaluators	95	0.5	8.2	0	19
FTE of Evaluators	94	0.4	6.7	0	18.5
Number of Administrators	96	1.6	3.9	0	31
FTE of Administrators	95	1.0	2.6	0	19
Number of Non-Professional Title I Staff	95	3.0	14.1	0	77
Number of Other (e.g., Social Services)	94	1.5	2.7	0	36
Title I Coordinator					
Percent of Time Devoted to Title I Administration	88	53.6	34.5	5	100
Percent of Coordinator's Salary paid by Title I	62	67.1	32.3	5	100
Years of Experience in Title I	88	9.5	4.6	1	16
Coordination with Other Federal Programs					
Number (Total) of Other Federal Programs in District	69	4.6	2.3	1	9

Table 12

District Importance Ratings of Legislative District Requirements

			Frequencies		
District Requirement	N	Mean	Little or No (1)	Moderate (2)	Substantial (3)
Funds Allocation					
Supplement not supplant-126(c)&(d)	52	2.5	7 (13.5%)	9 (17.3%)	36 (69.2%)
Excess costs-126(b)	47	2.2	11 (23.4)	17 (36.2)	19 (40.4)
Comparability-126(e)	47	2.1	12 (25.5)	18 (38.3)	17 (36.2)
Maintenance of effort-126(a)	49	2.0	13 (26.5)	22 (44.9)	14 (28.6)
Targeting and Eligibility					
Children to be served-123	51	2.8	1 (2.0)	6 (11.8)	44 (86.3)
Designating school attendence areas-122	46	2.4	9 (19.6)	9 (19.6)	28 (60.9)
Private school participation -130	49	1.9	16 (32.7)	21 (42.9)	12 (24.5)
Schoolwide projects-133	20	1.8	8 (8.2)	7 (35.0)	5 (25.0)
Program Design and Planning					
Requirements for design and implementation of programs-124					
Purpose of program-124(a)	51	2.8	1 (2.0)	9 (17.6)	41 (80.4)
Assessment of educational need-124(b)	53	2.8	2 (3.8)	9 (17.0)	42 (79.2)
Control of funds-124(m)	50	2.7	3 (6.0)	10 (20.0)	37 (74.0)
Accountability-127	52	2.6	2 (3.8)	16 (30.8)	34 (65.4)
Training of education aides-124(j)	51	2.6	2 (3.9)	16 (31.4)	33 (64.7)
Planning-124(c)	48	2.5	7 (14.6)	10 (20.8)	31 (64.6)
Sufficient size, scope, and quality-124(d)	47	2.5	4 (8.5)	14 (29.8)	29 (61.7)
Coordination with other programs-124(f)	47	2.3	7 (14.9)	17 (36.2)	23 (48.9)
Teacher and school board participation-124(i)	52	2.3	9 (17.3)	20 (38.5)	23 (44.2)
Individualized plans-129	52	2.3	11 (21.2)	12 (23.1)	29 (55.8)
Expenditures related to ranking of project areas & schools-124(e)	40	2.2	7 (17.5)	16 (40.0)	17 (42.5)
Information dissemination-124(h)	53	2.2	9 (17.0)	27 (50.9)	17 (32.1)
Noninstructional duties-134	53	2.0	15 (28.3)	24 (45.3)	14 (26.4)
Jointly operated programs-124(o)	33	1.8	13 (39.4)	12 (36.4)	8 (24.2)
Complaint resolution-128	51	1.8	19 (37.3)	23 (45.1)	9 (17.6)
Construction-124(n)	34	1.5	22 (64.7)	8 (23.5)	4 (11.8)
Evaluation					
Evaluation-124(g)	52	2.7	1 (1.9)	12 (23.1)	39 (75.0)
Sustaining gains-124(k)	50	2.1	10 (20.0)	27 (54.0)	13 (26.0)
Parent Involvement					
Parent Involvement-124(j)	53	2.7	1 (1.9)	16 (30.2)	36 (67.9)
Parent Advisory Councils-125	53	1.8	24 (45.3)	15 (28.3)	14 (26.4)

Table 13

District Problems with Legislated Requirements

Problems with District Requirements	Number of Districts
Funds Allocation	
Maintenance of effort-126(a)	5
Excess costs-126(b)	5
Supplement not supplant-126(c)&(d)	18
Comparability-126(e)	22
Targeting and Eligibility	
Designating school attendence areas-122	16
Children to be served-123	7
Private school participation -130	7
Schoolwide projects-133	2
Program Design and Planning -124,129,134	
Requirements for design and implementation of programs-124	
Purpose of program-124(a)	1
Assessment of educational need-124(b)	2
Planning-124(c)	0
Sufficient size, scope, and quality-124(d)	3
Expenditures related to ranking of project areas & schools-124(e)	6
Coordination with other programs-124(f)	7
Information dissemination-124(h)	1
Teacher and school board participation-124(i)	4
Training of education aides-124(j)	6
Control of funds-124(m)	1
Construction-124(n)	2
Jointly operated programs-124(o)	2
Accountability-127	2
Complaint resolution-128	2
Individualized plans-129	4
Noninstructional duties-134	14
Evaluation	
Evaluation-124(g)	4
Sustaining gains-124(k)	10
Parent Involvement	
Parent Involvement-124(j)	7
Parent Advisory Councils-125	22

Table 14 [a]

District Practices Study: Necessity of District Legislated Requirements

	N	Select Project Area	Select Students	Parent Involvement	Evaluation	Supplement not supplant	Maintenance of effort	Comparability	Excess Cost	Sufficient Size, Scope and Quality
Grand Mean	1415	3.8	1.8	5.7	3.7	5.3	6.6	7.3	7.6	4.6
District Enrollment										
Small	599	4.7	1.6	5.3	3.4	5.6	6.4	7.3	7.5	5.0
Medium	516	3.6	1.8	6.0	3.6	5.3	6.7	7.4	7.6	4.4
Large	276	2.6	2.3	6.0	3.9	4.9	7.0	7.1	7.8	4.4
Extra-Large [b]	24	2.4	2.0	5.4	4.8	4.0	7.4	7.6	8.2	4.0
Metropolitan Status										
Central City	206	3.1	2.1	5.7	3.9	5.0	6.9	7.1	7.8	4.5
Urban Fringe	415	3.9	1.9	5.7	3.7	5.3	6.7	7.5	7.6	4.7
Non-Metro	794	4.1	1.7	5.8	3.5	5.5	6.5	7.3	7.6	4.7
Poverty Level										
0- 5%	240	4.2	1.8	5.3	3.5	5.6	6.5	7.5	7.7	4.7
5-12%	492	3.9	1.8	5.8	3.6	5.3	6.7	7.4	7.6	4.7
12-25%	433	3.8	1.9	5.8	3.9	5.2	6.7	7.2	7.6	4.6
> 25%	250	3.7	1.8	6.0	3.7	5.3	6.5	7.3	7.5	4.5

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[a] The scale is from 1 (most necessary) to 10 (least necessary).

[b] Sampled with certainty

Table 15 [a]

District Practices Study: Burden of District Legislated Requirements

	Select Project Area	Select Students	Parent Involvement	Evaluation	Supplement not supplant	Maintenance of effort	Comparability	Excess Cost	Sufficient Size, Scope and Quality
Grand Mean	5.9	5.2	3.9	4.4	5.5	5.6	4.4	6.1	6.5
District Enrollment									
Small	6.2	5.1	3.9	4.1	5.5	5.5	5.7	6.0	6.1
Medium	5.8	5.3	3.8	4.7	5.7	5.5	3.8	5.9	6.7
Large	5.4	5.3	4.5	4.6	5.4	5.9	2.6	6.3	7.1
Extra-Large*	4.8	5.0	5.4	4.6	5.4	6.0	2.4	6.2	7.6
Metropolitan Status									
Central City	5.4	5.3	4.3	4.6	5.3	5.7	2.8	6.3	7.3
Urban Fringe	5.8	5.4	4.3	4.8	5.7	5.5	4.0	5.8	6.5
Non-Metro	6.1	5.2	3.7	4.2	5.6	5.7	5.0	6.1	6.4
Poverty Level									
0- 5%	5.8	5.6	4.4	4.4	5.6	5.2	3.7	6.1	6.4
5-12%	5.8	5.2	3.9	4.4	5.7	5.8	4.2	6.2	6.7
12-25%	6.1	5.1	4.0	4.5	5.4	5.6	4.7	6.1	6.6
>25%	6.1	5.2	3.7	4.4	5.5	5.6	4.9	5.8	6.3

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[a] The scale is from 1 (most burdensome) to 10 (least burdensome).

[b] Sampled with certainty.

PART THREE:

Title I - Analysis of State Management Practices

> It may well be that the federal government has reached its limit in addressing [administrative] problems through regulatory mechanism... The Title I program has gone about as far as it can in guiding local service development by mandating a careful and rational planning and evaluation process.

Donald W. Burnes
Richard L. Moss
1978

> It is not incorrect to say that education is a federal concern, a state responsibility, and a local hassle!...Federal aid to education is at a crossroads. Although few people who know federal aid would disagree that the current regulatory quagmire cannot be allowed to continue, there is considerable debate as to what should replace it.

Southeastern Regional
Council for Educational
Development
1981

> Title I is an older program with its...procedural equipment in place...The federal government needs to be sensitive to issues of program maturation and the stage of program development when regulatory approaches no longer produce any significant results. At that point, both federal and state roles need to change. For federal staff it means concentrating less on monitoring and enforcement, and more on identifying effective practice and disseminating this information among the states. The preferred state role would be similar with cues from the federal level now reinforcing this approach.

Lorraine M. McDonnell
Milbrey W. McLaughlin
1982

INTRODUCTION

In Part Three, the results from the interviews with the state Title I coordinators and their staffs are presented for each of the major state responsibilities, followed by a sampling of district comments.

The discussions are presented in the following order:

- state rulemaking,
- application approval,
- monitoring,
- technical assistance and dissemination,
- evaluation,
- parent involvement, and
- enforcement.

The areas of evaluation and parent involvement were included as areas of state management responsibility in this study. While some may argue that they are more appropriately labeled as local district activities, they are included here as state responsibilities, since the changes in the 1978 law to these requirements were felt to affect states. Specifically, the study staff felt that the extensive changes made in the 1978 Title I law to the district parent involvement requirements would affect states' activities in the following ways. For example, states might have modified their applications to reflect these new requirements, they might have needed to provide additional technical assistance to districts on these requirements, and they might have had to design new monitoring instruments to reflect these additional requirements. Similarly, the evaluation reporting requirements and the mandate of the evaluation models were also felt to have an effect on state management.

Enforcement is presented last for several reasons. First, since the audit responsibility is independent of the state Title I office, the coordinators had knowledge of fewer activities to report than in any other section of the interview. This lack of knowledge is reflected by the sparseness of the data reported. Second, because the auditing function is independent and not under the control of the Title I coordinator, state management in this area was not really reflective of a Title I management style. It was observed that the enforcement activities really did not "fit" into a quality or compliance orientation described for Title I management in the introduction to this report.

STATE RULEMAKING

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STATE RULEMAKING

Chapter Highlights

The 1978 Title I law codified long standing federal policy that states may issue their own rules, regulations, procedures, guidelines, or other requirements that are not inconsistent with any federal laws or regulations.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the rulemaking provisions included in the 1978 law (and the 1981 regulations):

- To what extent did the rulemaking provisions affect states' administrative practices?
- What problems did states encounter in exercising their rulemaking authority?
- Did the provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to make rules if this authority were not expressly permitted by law?

The results of the study show that ten states did not exercise their rulemaking authority; seventeen states, classified as minimal rule users, made rules primarily to clarify or interpret federal law for their districts; and twenty-two coordinators were classified as active rulemakers.

The study's major findings are:

- Active rulemakers tended to make informal rules even prior to the 1978 Title I law.
- Active rulemakers took the initiative more often in deciding when to make rules--their rules were initiated by the Title I unit rather than in perceived requests from district or federal personnel.
- Active rulemakers exercised their rulemaking authority to make rules to help districts design quality programs.
- Active rulemakers believed that the rulemaking authority strengthened their program administration.
- Active rulemakers indicated they would plan to continue to make rules even if no law allowed them to do so.

The management style of these active rule users was also characterized by successful use of the three-year application cycle to reduce paperwork for them and for their districts, active monitoring to ensure program quality but not as active generally to ensure program compliance, and more active use of personalized (rather than less personalized) technical assistance service delivery mechanisms.

Continuation of rulemaking activities under ECIA Chapter 1 would be difficult for some states if there is no express provision in the legal statute or regulations. States disagreed as to whether they had the authority to make and enforce rules if a provision were not expressly included in the legal framework. Even if the final Chapter 1 regulations permit rulemaking authority, the extent to which states can enforce their rules through use of various enforcement sanctions, withholding of payments for example, is unclear.

While all states wanted to be in control of their programs, some states' philosophies of "local control" will affect the extent to which their rulemaking authority can be exercised under Chapter 1. Nondirective states used the prescriptive 1978 Title I law to make their rules for them. With the less prescriptive Chapter 1 law, these "local control" states can not look to the law or regulations for guidance. They must decide if they wish to direct Chapter 1 through informal rules or leave program design powers up to their districts. These states may not be able to make rules, since they would be perceived as "directive" and perhaps counter to educational policy in their states.

Districts in the local control states had difficulties in differentiating state from federal rules. Some of the rules attributed to states, particularly Parent Advisory Council requirements, which were part of several prescriptive sections in the 1978 Title I, were also problematic for both states and districts. It is significant that these states were particularly sensitive to presenting a non-directive image, yet perhaps were unaware that some of their districts held them accountable for requirements they did not make.

Introduction

Section 165 of the 1978 Title I law codified long standing federal policy that states may issue their own rules, regulations, procedures, guidelines, or other requirements that are not inconsistent with any other federal laws or regulations. Prior to 1978, while the Title I statutes did not contain express authority for state rulemaking, the Title I regulations issued in 1976 empowered the states to make rules in one area--parent involvement.[1]

During the Title I reauthorization hearings conducted in 1977, the Deputy Commissioner for Elementary and Secondary Education in the U.S. Office of Education (now U.S. Department of Education) was asked to clarify the federal policy regarding the ability of states to issue regulations. His answer included these major points:

- No instructions had ever been issued to states that specifically prohibited their issuance of regulations that are more restrictive than the federal regulations.
- Conversely, ED never encouraged states to issue regulations that are more restrictive than the federal regulations.
- Section 116a.22(b) of the 1976 Title I regulations gives an implied rulemaking authority to states in that states can place additional requirements on districts so as to be assured that district projects are, in their judgment, of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting the special educational needs of the children to be served.

This federal policy appeared unclear and led to uneven interpretations of rulemaking authority by states.

This issue was explored indepth in a comprehensive study conducted by NIE of the clarity of the legal framework for state administration of the Title I program as it existed prior to 1978 (Gaffney, Thomas, & Silverstein, 1977). The NIE study noted that SEAs had to rely on correspondence from federal personnel and outdated handbooks to ascertain the appropriateness of their policies or guidelines. The unclear authority to make rules led to the situation where some states made lots of rules, while others made almost none. The active rulemakers were observed to make two types of rules--rules that clarified but did not restrict (e.g., providing examples of how to implement both inclass as well as pullout programs) and rules that restricted program design options of districts. Restrictive policies occurred generally as a result of the state's desire to:

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[1] Section 116a.25(h) of the Title I regulations states: "The state educational agency may establish such additional rules and procedures, not inconsistent with the provisions of this section, as may be reasonably necessary to insure the involvement of parents and the proper organization and functioning of parent advisory councils" (Federal Register, vol. 41, No. 189, 28 September 1976).

- clarify certain federal requirements that were intentionally left vague in the Title I statute or regulations (e.g., sufficient size, scope, and quality provisions);

- guard against audit exceptions--states selected overly restrictive policies either by choice or because of insufficient understanding of the requirement (e.g., the requirement that all districts are to use pullout programs is mandated neither by statute nor by regulation); or

- further state goals that may be encouraged by the state's general educational philosophy (e.g., requiring minimum staff qualifications or focus on particular grade spans).

The NIE study also noted that states developed rules in response to requests for additional clarification from districts or to requests to change practices to come into compliance made by federal personnel (often as a result of Program Review visits).

The extent of the rulemaking authority adopted by states was one of the state administration variables examined by Goettel, Kaplan, & Orland (1977) in another NIE-funded study. While the states' level of rulemaking activity was important in examining the extent of states' control over their districts, the power of enforcing the rules was also a critical factor in assessing successful state administration. Uneven enforcement of rules was observed in two areas:

- Rules were enforced differentially as a function of district: Districts large in allocation frequently challenged state policies or the power of states to enforce their rules, while districts with small allocations did not.

- Rules were enforced differentially as a function of content: Most states strongly enforced the funds allocation provisions but did not enforce the program design requirements. This latter finding may also be due, in part, to the differential enforcement requirements by ED.

The House Subcommittee on Elementary, Secondary, and Vocational Education emphasized in the hearings conducted prior to the 1978 Educational Amendments that states play an important role in administering Title I programs: "The important function they perform in such areas as application approval, monitoring, auditing, and enforcement should not be undercut because of uncertainty about their authority to establish state Title I rules and regulations" (p. 43). Furthermore, the NIE study recommended that ED clarify the scope of the rulemaking authority to reduce the risk that states will adopt overly restrictive policies. This recommendation appeared to guide the thinking of the House Committee members, as they expressed concern over possible misinterpretations of federal regulations. The Committee urged the Commissioner (now

Secretary of ED) to "clarify the various legal program design options and the circumstances under which different program components may be included in program designs" (p. 43).

The resulting law in 1978 gave the authority of states to adopt rules, regulations, procedures, criteria, or other requirements applicable to their administration of the Title I program as long as they do not conflict with any other applicable federal laws. In response to the Committee's concern, ED attempted in the Proposed Rules dated 1 June 1980 to clarify the statute by providing examples of (Section 116.122) and limitations on (Section 116.121) state rulemaking authority. While states could adopt reasonable rules concerning size, scope, and quality of Title I projects, staff-pupil ratios, amounts of instructional time provided to Title I students, or the number of categories of curriculum areas that may be included in a Title I project, states were not allowed to adopt rules that prescribed grade levels to be included in a Title I project or prohibited local agencies from including a particular curriculum area in its Title I project. States objected to the section delimiting their rulemaking authority, because they interpreted it to mean that states had to approve district programs in any curriculum area that the district could prove a need--thus, music or physical education programs backed by local needs assessments could not be disallowed. In the Final Regulations dated 19 January 1981, ED modified this language of the regulations. While giving LEAs the authority to determine which grade levels are included in their projects, and which curriculum areas are included, the regulations specified that the "curriculum areas meet all Title I requirements" (Section 200.122(c)(2)).

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the rulemaking provisions included in the 1978 law (and the 1981 regulations):

- To what extent did the rulemaking provisions affect states' administrative practices?
- What problems did states encounter in exercising their rulemaking authority?
- Did the provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to make rules if this authority were not expressly permitted by law?

In the midst of the data collection, new legislation that would affect Title I programs beginning in Fall 1982 was passed. Chapter 1 of the Educational Consolidation and Improvement Act of 1981, however, contained no express provisions for rulemaking. Thus, the last section of the rulemaking interview, namely the theoretical question of whether the states would plan to continue making rules if this authority was not expressly permitted by law, took on added significance. States were confronted with the possibility that no provision in rulemaking might exist in the new law.

The lack of a provision in the Chapter 1 legislation generated considerable controversy. Some states strongly believed that they were powerless to make rules without legal authority vested in them. Others felt that no provision was needed--that the power given to states to approve district applications carried with it an implied rulemaking authority. The situation created some unusual alliances. Very large states joined with some of the smaller, "local control," states to lobby for inclusion of a rulemaking provision in the Chapter 1 statute, since neither group felt it could make rules without express legal authority.

The draft Chapter 1 regulations, which were published in the Federal Register on 12 February 1982, included a reference to state rulemaking (Section 200.59):

> In accordance with State law, the State or an appropriate entity thereof, may adopt rules, regulations, procedures, guidelines, and criteria regarding the use of Chapter 1 funds, provided that those rules, regulations, procedures, guidelines, and criteria do not conflict with the provisions of
>
> (a) Chapter 1;
>
> (b) the regulations in this part; or
>
> (c) other applicable Federal statutes and regulations.

Since this news did not reach states until most of the data were collected, a uniform set of reactions to this provision in the Chapter 1 regulations was not collected.

This chapter summarizes the findings of the State Management Practices Study to each of the four questions listed above. Also included in this discussion are states' preliminary views of the impact of Chapter 1 on their future rulemaking activities. The chapter will conclude with opinions of a sample of districts to their states' past rulemaking activities.

Implementation

What is a Rule?

All states make rules considering the definition of rulemaking given in the 1978 statute: Any regulations, procedures, or guidelines issued by states are considered to be rules. In a strict sense, application approval procedures and deadlines are rules, but most readers would find this use of rules to be trivial. Gaffney, Thomas, and Silverstein (1977) tended to view most state rules as restrictive, because they eliminated program options for LEAs, which connotes a negative use of rule authority. The State Management Practices Study, however, chose to view rulemaking as a process that states could use to strengthen their state administration of a large, complex program. It was felt that this interpretation was consistent with that of the House Subcommittee presented in the introduction to this chapter: States' important functions in approval of applications, monitoring, and enforcement should not be undercut due to uncertainty about their rulemaking authority.

It will be apparent from this chapter that states make rules for different reasons. Some states make rules solely to clarify the federal Title I requirements, such as making rules to clarify what kinds of local activities involving private school participation are legal. Other states attempt to use their rulemaking authority to clarify what is meant by "sufficient size, scope, and quality" by requiring that districts follow certain program guidelines.

It will also be apparent from this chapter that states make rules in different ways. Some states make rules "informally," that is, without a public hearing, while other states must get the approval of their Chief State School Officer or the State Board before a Title I rule can be made. While some may argue that a rule that has not gone through a public hearing process is not a rule, the State Management Practices Study believes that these informal guidelines can be treated as rules because they are mentioned specifically by Section 165: Any procedure or guideline can be considered a rule.

These issues are restated as follows:

- Are rules differentially enforced as a function of the way in which they were made? A Title I coordinator in one state may make a rule that specifies that Title I services should be concentrated on the elementary grades. In another state, the State Board, with input from its Title I coordinator, may make a rule that all districts must serve the most educationally needy students in the areas of reading, mathematics, writing, and bilingual education. If districts challenge both of these rules, will the districts succeed? In one case, the rule was made informally, that is, by the Title I office, while the other rule went through a formal hearing process and was approved by the State Board.

- Are rules differentially enforced as a function of their content? If a district program fails to be supplemental, fiscal sanctions may be imposed on the LEA until it comes into compliance. Any state rules that may make it more likely for LEAs to meet the requirements are very likely followed without question. The question arises, however, as to a rule that requires LEAs to utilize small instructor-student ratios of not more than one instructor to five students. How enforceable is this rule if LEAs wish to utilize large groups in a laboratory setting?

- What enforcement sanctions can states use to enforce their rules? Do they view the rules made informally by the Title I unit as equivalent to the requirements of any federal or state law and hence enforce them as such? Or do the states try to convince their LEAs of the value of their rules, hope that their rules never get challenged, because if they do, states might have to back down?

All of these rulemaking and rule enforcement issues pertain to the ultimate legality of state rules. If rules do not go through a formal hearing process, and many of the Title I so-called rules do not, can they be enforced?

Another issue that will emerge in this chapter is that some states view themselves as being "local control" states. That is, they prefer to take a nondirective administrative posture in front of their districts. While they do not make any formal rules, those that would go through a formal hearings process, many make numerous informal guidelines to help their districts improve programs. Guidelines can be present in the instructions of an application or included as items to be reviewed in a monitoring checklist--they do not need to be published in a handbook of rules. Thus, as noted later in this chapter, some of these "local control" states tend to be categorized as active rulemakers because they make many "informal guidelines."

The use of rulemaking in Title I management is fairly complex. Whether "informal" guidelines are as binding on LEAs as "formal" rules is a critical issue. If they are not binding, they most likely cannot be enforced. If they cannot be enforced, do states, in fact, have the rulemaking authority as envisioned by Congress when Section 165 was added to the Title I statute?

These issues will be explored indepth throughout the remainder of this chapter.

The rulemaking series of interview questions, unlike any other in the interview, generated strong feelings on the part of the respondents. For some, the "local control" philosophy espoused by their states made it impossible for them to make formal rules governing Title I programs. These states were limited to making informal guidelines, which may or may not be enforceable if push comes to shove. For other coordinators, who indicated that they had been active rulemakers, the presciptive Title I law in 1978 brought the need for additional rulemaking activity to a halt. The mere thought of initiating rules to govern district choices was unpleasant to another group of coordinators, who indicated that any rules or informal guidelines they made were done solely in response to a perceived request from district or federal Title I personnel. While some coordinators firmly believed that the rulemaking authority was critical to the success of their program administration and that a rulemaking provision would need to be included in a Title I law for them to continue making rules, others firmly did not.

Rulemaking is very different from the other state responsibilities in that it is not required of states in the same way as is monitoring or approving applications or providing technical assistance: states will not be criticized for not making rules (especially as long as they have legal district programs), whereas they will be cited for failure to comply with their prescribed monitoring requirements. Thus, states might fall into a non-rulemaking category for several reasons--because of their state philosophy or because of feelings that the law leaves so few sections open to states for making rules. If states decide not to exercise their rulemaking authority, for whatever reasons, the question remains as to how these states might help their districts design quality programs. It was speculated that states might compensate for the nonuse by increasing their oversight in other areas, such as increased monitoring efforts or greater attention paid to the application process.

Any summary of the implementation of the rulemaking provision must include recognition of state contextual factors (e.g., the existence of formal rulemaking processes in the state and the educational philosophy of the state) and Title I contextual factors (e.g., minimal need for making rules created by a prescriptive law) in addition to those factors associated with the respondents themselves. The discussion of how states implemented their rulemaking authority, which will take these factors into consideration, will be organized around the following three questions:

- To what extent was the rulemaking authority given to states by the 1978 Title I law utilized?
- How did states use rulemaking to facilitate their administration of the Title program?
- To what extent is the rulemaking responsibility interrelated with other state responsibilities?

Extent of Rulemaking Activities

What are the Characteristics of Rulemakers?

State Title I coordinators were characterized as "active" rulemakers, "minimal" rulemakers, or "non-rulemakers" on the basis of their answers to the interview questions. The 22 coordinators classified as "active" rulemakers generally talked freely about their rulemaking processes, policies they had instituted, handbooks they had developed, and offered ways in which rulemaking had facilitated their program administration. The 17 coordinators classified as "minimal" rulemakers indicated they used rulemaking primarily to clarify or interpret the federal law for their districts and that they needed to use the provision only occasionally. Some of these occasional rulemakers, however, had established formal processes already existing in their states for making rules, and these individuals indicated they had no need to use the authority given to them by Title I law. Several characteristic responses of the 10 non-rulemakers were mentioned earlier in this section.

It had been hypothesized early in this study that use of the rulemaking authority would facilitate Title I administration in states having large numbers of LEAs, since any new policies made in response to federal requests or legislation could be disseminated to all districts to effect changes in a short period of time through published memoranda or handbooks or through use of monitoring or technical assistance mechanisms. States with small numbers of LEAs, on the other hand, seemed to have frequent SEA-LEA communications where any decisions involving changes to state or district practices could be discussed on an individual basis. Hence, official rules mandated across districts would not be needed.

Rulemaking use was therefore examined as a function of state demographics. The active rulemakers differed from the non-rulemakers and minimal rulemakers as expected, in that they had more LEAs, but the groups did not differ on numbers of professional Title I staff or on the amounts of state administrative setasides available to them.

Almost all (N =17) of the active rulemakers tended to be active in their rulemaking efforts even before the provision was included in the 1978 Title I law. Of those classified as minimal rulemakers, more than one-half (N = 9) tended to make all of their rules prior to 1978. These individuals generally reported that, with the enactment of the 1978 law, there was no need to make any more rules, since the federal legislation was more than adequate to guide program implementation or administration. Examining the extent of rulemaking activity (e.g., none, rules made before 1978, rules made both before and after 1978, or rules made primarily after 1978) as a function of state characteristics, it is evident that the pre-1978 rulemaking group and the before-and-after 1978 rulemaking group did not differ from each other in terms of allocation, population, numbers of LEAs or in numbers of staff. But both of these rulemaking groups tended to be larger than the non-rulemaker or post-1978 rulemaker groups.

Thus, while rulemaking may tend to be utilized more by the larger states, it is noteworthy that some large states continued to make rules after the 1978 Title I law, while others did not. Some possible reasons for this finding will be explored in the second section of this chapter, when the uses for rules are examined in detail.

How are Rules Made and Enforced?

State Title I coordinators were asked to indicate the extent to which the rules or guidelines affecting Title I programs were initiated by themselves, by their districts, or by federal personnel. On the basis of their answers, states were classified into four groups:

- State influence: Most of the rules made were initiated by the state Title I coordinator possibly with assistance from his or her staff.
- State-local influence: Most of the rules made were initiated almost equally by either the state Title I coordinator or by the districts.
- District influence: Most of the rules made were initiated by the districts.
- Federal influence: Most of the rules made were in response to perceived requests from federal personnel.

An examination of influence as a function of rulemaking use is presented in Table 1.

Table 1

Rule Influence as a Function of Rulemaking[a]

Use of Rulemaking	Rule Influence State	 State-Local	 District	 Federal
None	0	0	0	2[b]
Minimal	8	3	3	2
Active	16	4	1	1

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[a] Data from nine states are missing.

[b] This number could perhaps be legitimately increased to 10, since 8 states indicated no use of rulemaking due to adequacy of the federal Title I legislation. However, since those states did not answer the influence item on which the classification was based, their inferred answers are not included.

Clearly, the state-influence states are the most active rulemakers, followed by the state-local-influence states. Both of these groups (14 of the state-influence and 6 of the state-local-influence groups) also tended to be active in the making of rules both before and after 1978. The district influence and federal-influence groups, on the other hand, tended to be minimal rulemakers and equally divided between making rules only prior to 1978 and making rules both before and after 1978.

Once the decision to make a rule is made, the rule can be approved through use of formal or informal processes. The processes by which rules are made affecting their programs are summarized in Table 2.

Table 2
Rulemaking Processes Reported by States[a]

Process	Number of States
• Title I unit primarily	8
• Title I unit, plus input or approval from other unit in SEA	4
• Title I unit with approval by Chief State School Officer	9
• Title I unit with approval by State Board	9
• Title I unit plus input/approval by State Board, Legislature (including Secretary of State)	4
• Board of Regents or State Board	2
• Other undetermined public hearing process	5

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[a] Data from eight states are missing.

One group of 12 states indicated that they relied primarily on informal processes (i.e., the Title I unit, or the Title I unit plus input or approval from another unit in the SEA (generally a Federal Programs Division that may include the Title I unit)) to make rules or guidelines that affect Title I programs. Another group of 14 states indicated that any rules made in the state that affect local programs must go through a formal rulemaking process, which may include the Chief State School Officer, State Board, legislature, or a public hearing process.[2] Still another group of 15 states indicated that rules affecting Title I programs could be made either formally through the approved rulemaking procedures existing in the state or informally by the Title I unit.

The states reporting primary reliance on informal rules are clearly different from the rest: they have smaller Title I allocations, including amounts for state administration; total state revenues available for education; smaller populations in 1960, 1970, and 1980; less population density; fewer cities over 25,000 or 100,000; and fewer professional Title I staff. The three process groups did not differ with respect to numbers of LEAs. Informal rulemakers tended to be more active rulemakers, whereas the remaining states are split between minimal and active rulemaking. Most informal rulemakers also tended to make rules before and after the 1978 Title I law; the trend is less clear for the other two process groups, which tended to have larger percentages of states making rules only before 1978. The informal use group was split evenly between the state-influence and state-local influence groups; the other two process groups were primarily state-influence groups.

The demographic characteristics of the process groups coupled with a review of their answers to the rulemaking questions suggest that the so-called "local control" states tend to be informal rulemakers. Because some of these "local control" states were also characterized by this study as being active rulemakers, which appeared incongruent with the states' perceptions of themselves, rulemaking use was further investigated by an examination of states' enforcement activities. It was hypothesized that rules made informally by Title I staff--as opposed to rules that resulted from a formal hearing process--might not be strongly enforced, which would perhaps be congruent with the goals of a non-directive on "local control" states. Table 3 presents this relationship.

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[2] Data are missing from eight states that indicated no use of the Title I rulemaking provision. It is not known whether any of those had formal state processes that could have been used to affect Title I programs.

Table 3

Rule Process as a Function of Enforcement[a]

	Enforcement of Rules		
Rule Process	None Enforced	Some Enforced	All Enforced
Informal	2	0	10
Both	1	8	6
Formal	0	2	11

---

[a] Data from eight non-rule use states are missing.

It is apparent from Table 3 that most of the informal rulemakers tend to enforce all of their rules just as do the formal rulemakers. The only states that tended to differentiate enforcement policies are those with both formal and informal rulemaking procedures. The typical response of these states was that they were able to enforce all rules that were made via formal rulemaking processes, but their informal rules or guidelines could not be similarly enforced. An examination of the enforcement strategies reported by these three process groups shows that

- formal rulemakers enforce rules through monitoring and auditing or withholding of funds;
- informal rulemakers enforce their rules as they would enforce any federal law through application approval, monitoring, and auditing or withholding of funds; and
- both formal and informal rulemakers enforce their rules through application approval and coercion.

Three observations should be noted here. First, formal rulemakers enforce all rules using formal monitoring and enforcement procedures; they did not apparently feel the need to use bluffing or coercion to effect enforcement. Second, informal rulemakers also report using formal enforcement procedures. The informal rulemakers, however, justify their use of these procedures because of their assumption that their rules parallel the Title I law so closely that these rules can be enforced in the same way that any federal law can be enforced. The informal rulemakers, probably for this reason, also do not need to depend upon bluff and coercion and other persuasive enforcement techniques. Third, both the formal and informal process group uses application approval and monitoring to enforce their rules, but they do not make any claims that their rules closely follow federal law, which might facilitate enforcement. Instead, this group relies on coercion and persuasion to perfect enforcement, but, if challenged by districts, the Title I coordinators indicated they might have to back down. This group is perhaps more aware of what Title I rules can and cannot be enforced, since they have a working knowledge of the formal rule enforcement policies in their states. A few of these coordinators admitted that, if particularly large-allocation districts discovered that some of their informal Title I rules were not required by a state or federal law, they could not force the districts to implement them. While they believed that these Title I policies were reasonable in as much as some were designed to help districts improve the quality of their programs, the coordinators stood ready to accept alternative methods from districts deciding to challenge them.

The state-influence states tended to be the most active enforcers and were heavy users of all of the enforcement strategies discussed earlier. All but 2 of the 11 coordinators who indicated use of coercion as an enforcement strategy were classified as a state-influence state. This observation makes sense, since a request to initiate rules--either by the districts or be federal personnel--probably carries with it an implied enforcement authority. This hypothesis is somewhat supported by the data, although the number of states involved is small; the district-influence states reported relying only on the use of monitoring and auditing as enforcement techniques.

The following summarizes the study's findings on rule initiation and enforcement:

- State-influence states, and state-local influence states to a lesser extent, are active rulemakers and enforcers. State-influence states rely heavily on coercion and may have to back down in enforcement if challenged by districts. While formal and both formal and informal rule process groups tended to be primarily state-influence states, the informal group was divided among the state-influence and state-local influence states.

- District-influence and federal-influence states tend to be minimal rulemakers. Yet they feel free to use monitoring and enforcement techniques without relying on coercion, since a request for initiation of a rule may be perceived by states to carry with it an implied enforcement authority.

- Informal rulemakers tend to be small in population and allocation, yet are active rulemakers and active enforcers. They tend to enforce Title I rules in the same ways that they would enforce any federal law.

- The formal and both formal and informal groups are larger in population and allocation, yet are split between minimal and active rulemaking. While both groups enforced rules through use of formal monitoring and enforcement techniques, the both formal and informal group also tended to rely on coercion, and, if challenged by districts indicated they might have to back down in their enforcement.

What Other Factors May Affect Extent of Rule Use?

Three other factors were examined that were hypothesized to play an important role in states decisions to exercise their rulemaking authority: the importance states attached to rulemaking, including the amount of time states reported spending on rulemaking activities; perceived helpfulness of ED in this area; and state contextual factors.

Importance of rulemaking. It was hypothesized that state Title I coordinators who tended to feel the rulemaking provision was important would also tend to be more active in this area. The coordinators were asked to rate the rulemaking provision as being of "little or no importance," of "moderate importance," or of "substantial importance" in meeting the purposes of the Title I law. They were also asked what percentage of their time (and time of their staffs) was spent in rulemaking activities. Table 4 presents the median percent of time spent on rulemaking activities as a function of the importance ratings.

Table 4

Percentage of Time Spent in Rulemaking as a Function of its Importance[a]

Importance Rating	Median Percent of Time Spent	Low	High	N
Little or no Importance	.5	0	5.0	12
Moderate Importance	1.0	0	10.0	20
Substantial Importance	5.0	0	10.0	15
Group Median	2.0			

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[a] Data from two states are missing.

These data suggest that the amount of time spent in rulemaking activities as a function of how important states feel the provision is.

The amount of time spent on rulemaking is also related to states' extent of rule activity: Median percents of time spent on rulemaking by the non-rulemakers, minimal rulemakers, and active rulemakers are .5, 1.0, and 3.0, respectively.

Helpfulness of ED. State Title I coordinators were asked how ED has helped them to carry out their rulemaking responsibilities. The question was raised as to whether coordinators who felt that ED was supportive of their rulemaking efforts would be more likely to make rules. Table 5 presents these findings as a function of rulemaking.

Table 5

Helpfulness of ED as a Function of Rulemaking[a]

Use of Rulemaking	Helpfulness of ED Hindered	Somewhat Helpful	Helpful	Neither/ Not Consulted
None	0	0	0	3
Minimal	1	0	4	10
Active	2	2	14	3

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[a] Data from 10 states are missing.

It is apparent that active rulemakers generally felt ED was helpful. ED staff was helpful by reviewing rules states developed, by suggesting areas in which states should make rules to become in compliance with the law, and by supporting states' authority to make rules. Active users of the rulemaking authority also tended to report more interactions with ED; high proportions of the non-rulemakers and minimal rulemakers reported infrequent, yet neutral, consultations with ED on rulemaking issues. Since ED was often viewed in a supporting role by reinforcing states' clout to make rules--even states that were reluctant to make rules may have done so.

State contextual factors. It was hypothesized that rulemaking use might be affected by the type of organizational structure of a state--in particular, whether Title I functions were decentralized to other units in the state agency or whether regional offices were present. It was expected that small, self-contained units with no regional offices might not need to make rules, since communications among staff and LEAs might be frequent. Rulemaking might be more necessary in large decentralized states with functions spread across units and regional offices. The data, however suggest that no differences in level of rulemaking activity occured as a function of organizational structure.

Use of Rulemaking to Facilitate Program Administration

This section, which summarizes states' uses of rulemaking to facilitate program administration, is organized around three questions:

- For which LEA requirements did states make rules?
- To what extent did states use rulemaking to help design quality programs?
- To what extent did states use rulemaking to help strengthen program administration?

Content Areas of Title I Rules

State Title I coordinators were asked in which of the district requirements they made rules. The rules Title I units made that are of interest to this study are those that clarify the Title I federal legislation. To guide states' thinking in this area, the Title I coordinators were asked to use the district requirements presented in the 1978 Title I law as a basis for describing the rules that they developed. Because the program design requirements had considerable more leeway for state interpretation, more attention was paid to state rules in these areas as described in the next section below.

This question disturbed some coordinators, especially those who labeled themselves as nondirective, because it forced them to list all areas in which they made rules. Some coordinators answered the question only by reporting rules made through a formal rulemaking process, while others listed informal (called working procedures, guidelines, memoranda, for example) as well as formal rules. The data from the 46 coordinators who responded to this question are summarized in Table 6 as a function of rulemaking use.

Despite the fact that the data may be an underestimate of the numbers of rules made by states, especially by the states that consider themselves to be nondirective, it is noted that the relative proportions of rules made in each of the five categories--funds allocation, targeting and student selection, program design, evaluation, and parent involvement--by the minimal and active rulemasers were not as different as had been expected. It had been hypothesized that the minimal rulemakers might make fewer rules in the area of program design than the active rulemakers, since these coordinators indicated that their rules tended to clarify federal law; it had been anticipated that the minimal rulemakers would be active in making rules in the areas of funds allocation, targeting and student selection, parent involvement (primarily parent advisory councils), and evaluation (primarily sustaining gains). While the data in Table 6 offer some support for the hypothesis that minimal rule rulemakers tended not to make many rules in the area of program design, caution must be exercised so as not to overinterpret these findings. Since it was apparent that the nondirective states appeared to feel that targeting or funds allocation were more "acceptable" rulemaking topics than was program design, the issue of what rules states made to help their districts design quality programs was addressed again in another section of the interview and will be discussed next.

Use of Rules to Design Quality Programs

State Title I coordinators were probed to ascertain what rules they made to help districts design quality programs, as the regulations appear to encourage states to make rules to clarify the "sufficient size, scope, and quality" provision. Many varied names were given to the informal rules made by the coordinators--program memos, working procedures, operating procedures, guidelines, interpretations, policy statements, division-level policies--which made it somewhat difficult for the interviewer to make sure that the concept of making rules extended to whatever name for informal rules that was given out by the coordinators.

Rules or guidelines made in the area of quality program design did not always take the form of published memos or handbooks. A review of state administrative documents also shows that rules were tucked away in the district applications or in the monitoring checklists used by SEA Title I staff during their district onsite monitoring visits. Many of these rules inserted into the application or the monitoring checklists were those that are easy to quantify, such as those pertaining to the size (e.g., staff-pupil ratios, instructional time) or scope (e.g., type of program, grade-level focus) of the project.

Rules, obtained both from the coordinators and from their documents, fell into 15 different areas as shown in Table 7.

Table 7

Rules Developed by States to Help Design Quality Programs

Rule Areas	Number of States
• Staffing Rules	
- Staff-pupil ratios	16
- Title I staff qualifications	10
- Staff inservice requirements	7
- Education aide requirements	7
• Instructional Rules	
- Amount of instructional time	13
- Instructional approach (e.g., diagnostic-prescriptive)	7
- Evaluation (for program improvement)	7
- Coordination of Title I program with regular classroom approach	3
• Other Program Rules	
- Needs assessment	9
- Student selection	8
- Parent involvement	6
- Type of program (i.e., pullout, inclass)	4
- School-level plans	2
• Administration-related Rules	
- Per-pupil expenditure	5
- Recordkeeping systems	2

The numbers of design rules reported were related to the extent of rulemaking use. The states making more design rules were more likely to make rules even prior to the 1978 Title I law, while the less active rulemakers were not.

States reporting the higher number of design rules tended to utilize informal rulemaking processes or have both informal and formal processes in their states; only 2 of the 14 states reporting reliance primarily on formal rulemaking processes mentioned 3 or 4 design rules. The greater numbers of design rules are also reported only by the state-influence and state-local influence states as shown in Table 8.

Table 8

Design Rules as a Function of Rule Influence[a]

Rule Influence	Number of Design Rules 0	1-2	3 or more
State	4	9	13
State-local	1	2	4
District	3	1	0
Federal	4	1	0

---

[a] Data from seven non-rulemaking states are missing.

Thus, states classified as active in making rules to help design quality programs tend to have coordinators who initiate rules on their own (or in conjunction with their districts), rely primarily on informal rulemaking processes (or a combination of informal processes with formal rulemaking procedures), and make rules over a long period of time (extending prior to 1978).

Years of experience held by the Title I coordinators are associated with the presence of any design rules. It is also true that the more active rulemakers generally have more years of experience. This greater amount of experience may make it easier for states to make and enforce rules, particularly in the design area, since they have presumably developed effective working relationships with their districts. It may also mean that the experienced coordinators feel more comfortable with their oversight role and are willing to take the risk of making some few program design rules that may be challenged and rejected, knowing that their intentions of trying to help districts improve local programs are good.

While states differed in the numbers of design rules made, it was possible that the content of these design rules might also be important. An examination of the 15 types of rules displayed in Table 7 suggests that some, such as instructional approach or staff-pupil ratios, were focused more on program than others, such as recordkeeping systems or student selection. Analyses carried out on these data suggested that the eight staffing and instructional rules listed were highly intercorrelated. A variable was created that reflected the number of "quality" design rules made by each state within this subset of eight items (range: 0 to 7).

The number of quality design rules reported by states was significantly related to overall rulemaking use (see Table 9).

Table 9

Quality Design Rules as a Function of Rulemaking

Use of Rulemaking	Numbers of Quality Design Rules	
	0 - 1	2 or more
None	10	0
Minimal	17	0
Active	8	14

The 14 active states reporting the higher number of quality design rules began making rules prior to 1978 and are the state-influence (and state-local-influence) states. As shown in Table 10, they do not rely exclusively on formal rules.

Table 10

Quality Design Rules as a Function of Rule Process[a]

Rule Process	Numbers of Quality Design Rules	
	0 - 1	2 or more
Informal	6	6
Both	8	7
Formal	13	1

---

[a] Data from eight non-rulemaking states are missing.

A high number of quality design rules is also associated with a high rating of importance for rulemaking; all of the ratings of rulemaking as "little or no importance" were reported by the states with 0 or 1 quality design rules.

To summarize, states that report making quality design rules differ from those that report making lists of design rules in that they are only the active rulemakers--no minimal rulemakers ever reported making two or more of the quality design rules. On all other dimensions, however, they are similar.

Use of Rules to Strengthen Program Administration

State Title I coordinators were asked to what extent the rulemaking provision facilitated their administration of the Title I program. About one-half of the coordinators felt that the provision had facilitated their administrative efforts. Sample responses include: "rulemaking gives us clout;" "brings about more consistency in program implementation at local level;" "is important for state operation of a program;" "it's nice to have in the law, even if you don't need to use it." The states indicating that the rulemaking provision did not facilitate their program administration indicated that "we always assumed we had the power;" "there is no need for the provision, since there were too many rules and regulations created by the 1978 law anyway;" "we have the power under state law (as a designated state office has the power) to make rules governing Title I programs;" "a provision for rulemaking may be much more important in a less prescriptive law."

The feeling that rulemaking strengthens program administration is related to states' use of the provision as shown in Table 11.

Table 11

Reports of Rules to Strengthen Program Administration as a Function of Rulemaking

Use of Rulemaking	Rules Strengthen Program Administration No	Rules Strengthen Program Administration Yes
None	10	0
Minimal	10	7
Active	5	17

In addition, while those who felt that rules do not strengthen program administration were evenly divided among rule use prior to 1978 and use both before and after 1978, almost all of the states favoring use of rules to strengthen administration (N = 17) were active in their rulemaking activities both before and after the 1978 Title I law.

The tendency to feel rules strengthen program administration was reported by the coordinators who tended to play a more active role in initiating rules (e.g., state-influence or state-local influence states) as shown in Table 12.

Table 12

Reports of Rules to Strengthen Program Administration as a Function of Rule Influence[a]

Rule Influence	Rules to Strengthen Program Administration No	Yes
State	8	16
State-local	2	5
District	2	2
Federal	4	1

---

[a] Data from nine states are missing.

Greater numbers of quality design rules were also related to reports that rules were used to strengthen program administration as shown in Table 13.

Table 13

Reports of Rules to Strengthen Program Administration as a Function of Quality Design Rules

Quality Design Rule Reported	Rules to Strengthen Program Administration No	Yes
0 - 1	22	13
2 or more	3	11

Thus, the state coordinators who felt that rulemaking tended to strengthen their program administration were active rulemakers--in terms of their use of design rules, in length of time they have been making rules, and in terms of the coordinators taking more responsibility in initiating rules. The profile of states indicating that there was no need for the provision was one of inactivity: all of them were non-rulemakers or minimal rulemakers, all made one or fewer quality design rules, they tended to be federal-influence or district-influence states in terms of initiation of rules, they tended to make most of their rules prior to 1978. There was a tendency for the coordinators who felt rulemaking strengthened their program administration to rely primarily on informal rules, while the coordinators who felt there was no need for the provision did not.

Because such a large number of states, approximately one-half, felt that the rulemaking provision did not facilitate their program administration, the question was raised as to how these states *did* manage their programs. For example, instead of relying on rulemaking authority, states might rely on providing more technical assistance to help districts improve the quality of their programs or by being more active monitors in the area of program quality to ensure that districts focus on program quality issues. The extent to which less active rulemaking states engaged in these other activities is discussed in the next section.

Interrelationship of Rulemaking with Other State Responsibilities

The making of rules was expected to be related to other state responsibilities. For example, states might need to provide technical assistance to districts to help them understand the new rules and to help them implement the new policies for states might need to monitor district practices to ensure that the state-developed Title I rules were being implemented. Thus, one might expect that active rulemakers would also be active monitors or providers of technical assistance. On the other hand, states that are characterized as active in rulemaking might tend to have an active management style across all of their responsibilities--hence, active rule makers might tend to be active in all activities regardless of the numbers of rules on content of the rules they developed.

This section will examine rulemaking activities as a function of activities in other areas of state responsibility, particularly application approval, monitoring, technical assistance, and evaluation, to determine more clearly what role rulemaking plays in state management of the Title I program. The discussion will focus on the extent of rule activities in three ways:

- active rulemakers--active use of other responsibilities;
- active rulemakers--less active use of other responsibilities; and
- less active rulemakers--active use of state responsibilities as compensation for lack of rules.

Active Rulemakers: Active Use of Other Responsibilities

Monitoring. As shown previously in Table 10, active rulemakers tend to make numerous rules to help districts design quality programs. Since states tended to report enforcing these rules through monitoring, it was expected that states active in making quality design rules would also tend to monitor actively in the area of quality of service. Table 14 suggests that this relationship holds--active makers of quality rules are also active in monitoring for program quality, while less active rulemakers are not.

Table 14
Quality Design Rulemaking as a
Function of Monitoring for Program Quality

Number of Quality Design Rules	Number of Quality Items Monitored 0 - 1	2 or more
0 - 1	23	12
2 or more	3	11

Evaluation. The hypothesis was explored as to whether rulemakers, who were especially active in making rules to help improve program quality, would also be active in evaluation activities, since states reported making rules in the area of evaluation for program improvement. For example, one state rule required that all districts with achievement gains lower than a cutoff point were to address this problem in writing to the SEA else funds would be withheld. Two types of activity relationships were examined--one activity is defined as a function of the extent of implementation time and the other in terms of the content of the activity.

One characteristic of a state active in evaluation, as will be discussed in the chapter on Evaluation, is the implementation of the Title I evaluation and reporting system (TIERS) prior to its mandate in 1978. An examination of the early/late evaluators with the onset of rulemaking activities shows that the states that reported making almost all of their rules prior to 1978 or that they initiated rules only after 1978 also tended to implement TIERS after the 1978 mandate. Thus, inactive rulemakers tended to be inactive in evaluation also. The active rulemakers (in terms of their making rules both before and after 1978), on the other hand, were evenly divided among early and late TIERS implementation. If rule content of these active rulemakers is examined, however, a slightly different picture emerges (as shown in Table 15).

Table 15
Quality Design Rulemaking as a
Function of TIERS Implementation[a]

Number of Quality Design Rules	TIERS Implementation Pre 1978	Post 1978
0 - 1	11	19
2 or more	8	4

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[a] Data from seven states are missing.

As evident from Table 15, states that make the greater number of quality design rules also have more extensive evaluation experience, while the lesser number of quality design rules is associated with more recent implementation of TIERS. This finding confirms that the more active rulemakers are also the more active in evaluation.

One important evaluation activity for states was helping districts to use their evaluation data for improving their programs. Since rulemaking in this area was associated with active rule use, it was expected that active rulemaking states would also be active in helping districts use evaluation data to improve their programs--by providing technical assistance to districts on data utilization for program improvement, by reviewing evaluation results with districts for purposes of pinpointing program strengths and weaknesses, by providing feedback reports to districts on their program strengths and weaknesses, or by carrying out statewide analyses of achievement gains to determine if low achievement gains were associated with particular program characteristics that could be identified and corrected. Use of rulemaking was examined as a function of the number of data utilization activities reported by states (as shown in Table 16).

Table 16

Rulemaking as a Function of
Evaluation Data Utilization Activities Reported by States

Use of Rulemaking	Number of Data Utilization Activities Reported 0	1-2	3-4
None	6	3	1
Minimal	4	11	2
Active	6	7	9

The relationship depicted in Table 16 suggests that non-rulemakers tend to report few, if any, data utilization activities; minimal rulemakers tend to report a moderate number of such activities; while active rulemakers report more activity in this area.

In the chapter on Evaluation, one prominent theme is the issue of whether states should be involved in such evaluation activities or whether these activities should be left up to local districts. The lack of activity reported here for the non-rulemaking states, some of which are also "local" control states, may be consistent with the attitude of greater local options.

Technical assistance. A similar pattern of activity is observed in the area of technical assistance. Table 17 shows that the number of states reporting use of workshops to provide technical assistance to LEAs varies as a function of rulemaking activities.

Table 17
Reports of Technical Assistance Workshops as a Function of Rulemaking

Use of Rulemaking	Use of Workshops No	Use of Workshops Yes
None	5	5
Minimal	6	11
Active	3	19

Summary. The examples presented here in Tables 14-17 show that active rulemakers are also active in other areas, such as providing technical assistance to LEAs, monitoring for program improvement, in implementing evaluation activities prior to their mandate, or helping districts use evaluation data to improve the quality of their local programs. While active rulemakers may generally have an active management style, they do tend to differentiate among kinds of activities as discussed in the next two sections.

Active Rulemakers: Less Active Use of Other Responsibilities

In some activities, active rulemakers are less active than might be expected or almost as active as the minimal rulemakers or non-rulemakers. Several examples of these observations are presented below in the areas of parent involvement, technical assistance, monitoring, and application approval.

Parent involvement. Parent involvement is another area in which coordinators made rules. Some rules, for example, pertained to eligibility requirements for being a voting member of a PAC, while others required specified amounts of parent training. The extent of state-level parent involvement activities was examined as a function of rulemaking. As shown in Table 18, the minimal rulemakers tended to report more state parent activities. While some of the active rulemakers reported greater numbers of parent activities at the state level, a large percentage of the active rulemakers tended to report fewer numbers of parent involvement activities.

Table 18
State-Level Parent Involvement Activities Reported as a Function of Rulemaking

Use of Rulemaking	State-Level Parent Involvement Activities 0-1	State-Level Parent Involvement Activities 2 or more
None	5	5
Minimal	5	12
Active	9	13

Thus, high levels of rulemaking activities are not so clearly related to high levels of state-level parent involvement activities.

Technical assistance. In Table 17 it was noted that reports of providing workshops for LEAs varied as a function of rulemaking. An examination of rule use with the reports of providing statewide conferences shows a different picture (see Table 19).

Table 19

Reports of Statewide Technical Assistance Conferences as a Function of Rulemaking

Use of Rulemaking	Statewide Conferences Reported No	Statewide Conferences Reported Yes
None	3	7
Minimal	6	11
Active	13	9

In this instance, the non-rulemakers and minimal rulemakers reported the use of statewide conferences, while the active rulemakers did not. This observation, while appearing to contradict the findings shown in Table 17, actually does not; it is consistent with the discussion in the chapter on Technical Assistance, which suggests that use of statewide conferences as a technical assistance mechanism is generally related to lesser amounts of administrative activity by states. More personalized services, in the form of workshops, for example, as opposed to less personalized services, statewide conferences, for example, appear to be associated with a "quality" Title I administration.

Monitoring. While monitoring for program quality varied as a function of quality design rule activity (as shown in Table 14), the question was raised as to whether active rulemakers would also be active in monitoring for compliance to ensure legality of projects. While non-rulemaking and minimal-rulemaking states tend to report fewer ways in which legality of the projects are monitored (as was expected), the active rulemakers are fairly evenly divided among the high and low levels of monitoring for program legality. An examination of rule content with the monitoring for compliance parallel with that shown in Table 15 for monitoring for program quality indicates that rulemakers active in program design rules are not active to the same degree in monitoring for program compliance. This relationship is shown in Table 20.

Table 20

Quality Design Rulemaking as a
Function of Monitoring for Compliance

Number of Quality Design Rules	Number of Ways in Which Program Compliance is Monitored 0-2	3 or more
0-1	23	12
2 or more	6	8

Application approval. In the chapter on Application Approval, it was postulated that an active, problem-solving stance might be necessary to make the three-year application cycle work. It was therefore hypothesized that the active rulemakers who tried the three-year cycle would be more likely to feel that it did, in fact, reduce their paperwork burden, whereas the less active rulemakers would not. Table 21 presents use of the three-year cycle as a function of rulemaking.

Table 21
Use of Three-year Application Approval Cycle as a
Function of Rulemaking[a]

Use of Rulemaking	Three-Year Cycle Use No	Yes, No Paperwork Reduction	Yes, Paperwork Reduction
None	0	5	3
Minimal	9	2	6
Active	7	4	10

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[a] Data from three states are missing.

Even though all of the non-rulemaking states reported trying the threeyear cycle, they were generally not successful in reducing their paperwork. It is true that fairly large proportions of the minimal and active rulemaking groups did not try the three-year cycle. Of those who did, however, the level of satisfaction with the cycle in terms of reduction of paperwork increased as a function of rulemaking.

Summary. The examples presented in this section show that active rulemakers have an active management style that differentiates between Title I management activities. In the case of technical assistance, they tend to be more active in using more personalized service delivery mechanisms (such as workshops for small numbers of LEAs) and less active in utilizing less personalized services (such as statewide conferences). While they tend to report extensive monitoring to ensure program quality, they are not as active in monitoring generally for program compliance. While active rulemakers do tend to conduct numerous state-level parent involvement activities, a sizable number do not. While the active rulemakers who used the three-year cycle were generally satisfied that the cycle helped reduce their paperwork burden, approximately one-third of the active rulemakers did not attempt to use the cycle.

Less Active Rulemakers: Active Use of Other State Responsibilities as Compensation for Lack of Rules

The focus in the previous two sections was on characterizing active rulemakers in terms of their state administrative activities.

It seems reasonable that state Title I coordinators who make a lot of quality design rules would follow through with their other responsibilities to ensure that these rules are disseminated and enforced. But one might ask whether minimal rulemakers achieve the goal of helping districts improve their programs if they do not make rules or monitor more for program quality on compliance? This question led to greater consideration of what part rulemaking plays in state administration.

When coordinators were asked what rules they made to help districts design quality programs, 11 replied that while they made few rules, they tended to rely on other state administrative activities (such as technical assistance and application approval) to achieve the same goal. A reexamination of the data presented in Tables 17-19 supports this idea in that the minimal rulemakers tended to rely on both workshops and statewide conferences to provide services to their districts. These minimal rulemakers also tended to be active in conducting numerous state-level parent involvement activities; these parent involvement activities included conducting workshops or conferences, developing and disseminating information to LEAs, and working with a state Parent Advisory Council.

States that make few or no rules might be expected to rely on technical assistance sources other than themselves to help their districts with program design and evaluation activities, simply because they or their staffs may not have enough content expertise to disseminate to districts. The fact that more Title I experience held by coordinators is related to a greater amount of rulemaking activity, especially numbers of design rules, supports this hypothesis. Thus, the data were examined to determine the extent to which these minimal rules use states relied on other sources, such as the Technical Assistance Center (TAC), to provide assistance to their districts.

Table 22 presents states' use of the TAC, use of evaluation materials produced by other sources (e.g., the TAC, ED, other states), and use of general technical assistance materials produced by other sources (e.g., ED curriculum materials, other states' handbooks, National Dissemination Network project materials, ERIC materials).

Table 22

States' Uses of Other Technical Assistance Sources as a Function of Rulemaking

Use of Rulemaking	TAC Use		No. of Evaluation Materials Used by States			No. of Technical Assistance Sources Used by States		
	Low	High	0	1-3	4 or more	0-1	2-3	4 or more
None	7	3	2	3	5	2	6	2
Minimal	6	11	3	4	10	3	7	7
Active	12	10	7	5	10	7	5	10

This table suggests that minimal rulemakers do tend to take advantage of other technical assistance sources. What is surprising is the fact that the non-rulemakers do not. Since the non-rulemakers tended to be generally inactive in monitoring and technical assistance activities, the question remained as to what mechanisms these states might have used to help districts achieve quality and legal programs. One other hypothesis was explored: For states that reported providing minimal amounts of technical assistance, monitoring, and evaluation activities, the application approval process might become a very important activity.

As described in the chapter on Application Approval, each state's district application was reviewed to determine the extent to which this document was used to collect information on 21 district requirements. While the Title I law does not require that all of these points be represented in the applications, states were required to ensure that the requirements of the relevant provisions are met. Applications were reviewed to determine to what extent states used the application to collect information on these points. Each requirement received a rating of "absent," "insufficient," or "sufficient," depending upon the amount of information states requested in the application forms and instructions. States were then categorized by their overall scores as being in one of five categories: (1) their applications were primarily "absent" considering these 21 points, (2) their applications were primarily "insufficient" to make the needed compliance determinations on the 21 points, (3) their applications were primarily "sufficient" considering the 21 points, (4) the applications were equally divided among the three rating groups, or (5) the applications were equally divided among the "insufficient" and "sufficient" rating groups. Table 23 presents states' application ratings as a function of their rulemaking.

Table 23

States' Application Ratings as a Function of Rulemaking[a]

Use of Rulemaking	Application Ratings Primarily Absent	Primarily Insufficient	Primarily Sufficient	Equal	Insufficient/ Sufficient
None	1	1	5	1	2
Minimal	0	2	8	2	5
Active	3	6	7	0	4

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[a] Data from two states are missing.

What is striking about these data is the contrast in activity level of the non-rulemakers compared with the data presented for non-rulemakers in the previous tables. The non-rulemakers and minimal rulemakers have applications that tend to collect sufficient amounts of information on most of these 21 points of law, while the active rulemakers, on the other hand, have a higher percentage of states receiving primarily "insufficient" ratings. This observation tends to support the hypothesis that minimal rulemakers may use the application approval process to compensate for the lack of rules made. While they may not choose to require that districts follow certain program guidelines, these coordinators apparently require that their districts focus on the necessary compliance and quality issues in any way they choose--as long as they report enough information to them on the application so that the state office can make the necessary determinations to ensure district programs are legal and that they address the necessary program quality issues. This table also suggests that active rulemakers who do rely on program design rules to guide districts and who report many monitoring and technical assistance activities may not need to rely on the application as a stimulus to ensure that districts pay attention to compliance and quality issues.

An examination of the active rulemakers who scored primarily "insufficient" and "sufficient" ratings on their applications sheds additional light on the question. Table 24 compares the two groups on several variables. The numbers of states in each group are small, which prevents strong conclusions from being drawn. However, several trends, albeit weak, are noted. The primarily "sufficient" rating group appears to fit the activity pattern presented throughout this chapter for active rulemakers (e.g., informal rulemakers, active before 1978, less reliance on TAC or statewide workshops, reports of satisfaction with three-year application cycle), while the primarily "insufficient" ratings group tends to fit the picture described for minimal rulemakers (e.g., more formal users, active primarily after 1978, greater use of TAC and statewide workshops, less satisfaction with three-year application cycle). While the "insufficient" rating group reported a greater reliance on coercion as an enforcement strategy, more of the primarily "sufficient" group that reported

Table 24

Active Rulemakers: Comparison of States with "Insufficient" and "Sufficient" Ratings

	Rating Groups	
Variable	Primarily Insufficient (N=6)	Primarily Sufficient (N=7)
Rule process	Informal = 1 Both = 2 Formal = 3	Informal = 4 Both = 2 Formal = 1
Use of coercion to enforce rules	No = 3 Yes = 3	No = 5 Yes = 2
If challenged, may have to backdown	No = 6 Yes = 0	No = 3 Yes = 4
TIERS implementation	Pre 1978 = 1 Post 1978= 3	Pre 1978 = 4 Post 1978= 3
TAC use	Low = 2 High = 4	Low = 4 High = 3
Monitoring for quality of service	Low = 1 High = 5	Low = 3 High = 4
Use of statewide technical assistance workshops	No = 3 Yes = 3	No = 5 Yes = 2
Use of 3-year application	No = 3 Yes, paperwork not reduced = 2 Yes, paperwork reduced = 1	No = 1 Yes, paperwork not reduced = 2 Yes, paperwork reduced = 4

that, if challenged, they would have to back down on enforcing rules. This observation suggests that even active rulemakers may need to rely on the application as an "enforcement" device, especially if they are unable to enforce their rules completely without having to back down if challenged. It is of interest that three of these states that reported backing down also reported actively monitoring to ensure program quality.

All of these findings taken together suggest:

- While non-rulemakers generally are inactive in monitoring for program quality and compliance and in providing large amounts of technical assistance to their districts, they perhaps compensate for the lack of rules by using the application as an enforcement device to ensure that districts address the necessary legal requirements.

- Minimal rulemakers, while inactive in monitoring a program quality and compliance, tend to rely on other sources, such as TAC, to provide technical assistance to their districts. They also tend to compensate for a lack of rulemaking by reliance on greater amounts of technical assistance and on the use of the application as an enforcement mechanism to ensure that districts address the necessary legal requirements.

- While active rulemakers generally tend to do extensive monitoring for program quality, to provide lots of evaluation and other technical assistance to their districts, and rely less on other sources, such as TAC, to help their districts, the active group was split in its use of the application to ensure adherence to legal requirements. A primarily "insufficient group," which resembled the minimal rulemaking group, tended to rely on other sources, such as TAC, to provide technical assistance, relied on less personalized technical assistance mechanisms (such as statewide workshops), yet also monitored extensively for both program quality and compliance. It appears that these states used their rulemaking and monitoring activities to ensure quality and legal programs instead of the application. Since a number of these states tended neither to use the three-year cycle nor to be satisfied with the cycle, they may have decided to rely less on the application as a vehicle for achieving this goal.

  The primarily "sufficient" rating group, on the other hand, suggests that, despite active rulemaking activities, states may have to back down in their enforcement of rules. It may therefore be more necessary for these states to rely on extensive monitoring and on the collection of sufficient information on the application to ensure that district practices meet the requirements of the law, especially if their rules may not be totally enforceable.

Problems

State Title I coordinators were asked to what extent the rulemaking provision created problems for them in their program administration. Of the 14 states reporting problems, 11 of them indicated that they encountered problems in trying to make rules on the various district requirements. Table 25 presents the number of problems reported for each district requirements.

Table 25

Reports of Rulemaking Problems by District Requirement

	Number of Problems	
Funds Allocation	7	
• Maintenance of effort (Sec. 162(a))		1
• Supplement, not supplant (Sec. 126(c)(d))		4
• Comparability (Sec. 126(e))		2
Targeting	2	
• Designating school attendance areas (Sec. 122)		1
• Children to be served (Sec. 123)		1
Program Design	4	
• Sufficient size, scope, and quality (Sec. 124(d))		1
• Training of education aides (Sec. 124(j))		1
• Individualized plans (Sec. 129)		1
• Noninstructional duties (Sec. 134)		1
Evaluation	0	
Parent Involvement	1	
• Parent involvement (Sec. 124(j)		1

Problems reported by two Title I coordinators centered around the belief that the provision was an unnecessary intrusion into states' rights. The problem reported by one coordinator, concerning limitations of rulemaking authority specified in the Title I regulations, was actually not a problem, since the item in question was deleted from the final 1981 regulations; this coordinator, however, had not yet read the final regulations at the time of the interview.

The most active rulemakers, in terms of onset of rulemaking, initiation of rules by state-influence or state-local influence states, use of rules to strengthen program administration, and level of activity, tended to report problems. The design rules made by states that tend to be associated with reports of rulemaking problems are in the following areas:

- instructional time,
- evaluation (for program improvement),
- staff inservice, and
- needs assessment.

Rules made in the areas of per-pupil expenditures coordination of Title I with the regular classroom instruction, and recordkeeping were almost never mentioned by coordinators who reported problems.

The presence of rulemaking problems was also significantly related to reports of extensive monitoring for program quality, since it was observed earlier that numbers of quality design rules were significantly related to numbers of quality items monitored. Rulemaking problems were not related to the number of compliance items monitored.

A higher percentage of coordinators reporting the use of informal rulemaking processes also reported rulemaking problems, but lack of rule enforcement was not associated with reports of rulemaking problems. The use of any particular enforcement mechanism was also not significantly related to the reports of rulemaking problems.

While it was expected that coordinators reporting use of coercion might tend to report more problems, this was not the case. Nor was it true that coordinators who reported backing down in their enforcement if challenged tended to report problems.

These relationships are presented in Table 26.

Table 26

Rulemaking Problems as a Function of State Activities

Presence of Problems	Monitoring				Rulemaking					
	Number of Quality Design Rules		Number of Quality Monitoring Rules		Rulemaking Process			Rule Enforcement		
	Low(0-1)	High(2-4)	Low(0-1)	High(2-4)	Informal	Both	Formal	Informal	Both	Formal
No	23	6	22	13	6	10	10	4	7	5
Yes	6	8	4	10	6	5	3	0	3	11

It had been expected that problems would be reported by states that felt that ED was not supportive of their efforts. Table 27 presents ths relationship.

Table 27

Rulemaking Problems as a Function of ED Helpfulness[a]

	Helpfulness of ED			
Presence of Problems	Hindered	Somewhat Helpful	Helpful	Neither/ Not Consulted
No	3	1	10	11
Yes	0	1	8	5

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[a] Data from 10 states are missing.

In fact, the three state coordinators who reported that ED hindered their efforts did not report problems. They reacted by deciding not to consult ED personnel on subsequent issues or by not making rules. One coordinator who strongly believed that the intent of the federal review teams was to indict states for their administrative practices reported that he limited his rulemaking activities solely to a minimal clarification of the federal law so as not to invite criticism.

A large number of state coordinators who reported problems felt that ED was extremely helpful. Sample comments made by these cordinators include: "ED pointed out problems with district compliance and gave us insights as to which areas we should focus our rulemaking activities on;" "the feds reviewed our rules and offered helpful suggestions;" "we bounced our rules off the feds first before we disseminated them."

It had been hypothesized that state coordinators who experienced difficulties with the rulemaking provision might also tend to rate it as being low in importance in meeting the goals of the Title I program. The data do not support this notion; in fact, a greater percentage of the coordinators reporting problems also rated the provision as being of substantial importance.

While extent of rulemaking could be mediated in terms of state demographic characteristics, states reporting problems did not differ on variables of staff, state administrative setaside, or numbers of LEAs from those that did not. The states reporting problems did, however, lose substantially in terms of population from 1970 to 1980 and they had greater contributions of local funds to their overall education revenues than did the states not reporting problems. In summary, there was a tendency for the most active states to report problems: those making more design rules, those taking the initiative to make rules, those using informal rulemaking processes, those making rules beginning prior to 1978, those also monitoring extensively for program quality, and those enforcing all rules. Neither weak enforcement strategies nor lack of support from ED led to reports of problems as had been expected.

Exemplary Practices

State Title I coordinators were asked if they had developed any successful practices or materials in the area of rulemaking with which they were particularly pleased and that could be shared with other states. Eleven states indicated that they had successful practices: three reported development of successful processes, such as particular rules or compilations of federal and state laws pertaining to Title I programs, while nine reported exemplary materials, such as handbooks or Title I policy manuals.

While reports of exemplary practices tended to be made by the active rulemakers--particularly those that began making rules prior to 1978 and those who took the initiative to make rules themselves (or with their districts)--the profile of the states reporting exemplary practices could not consistently be categorized as "active" to the extent described in the implementation section. While making rules to strengthen program administration was not associated with reports of exemplary practices, the making of numerous quality design rules is. The design rules made by states that tended to be associated with reports of exemplary practices are in the following areas:

- staff-pupil ratios,
- amounts of instructional time,
- evaluation (for program improvement),
- instructional approach,
- staff inservice, and
- recordkeeping procedures.

While development of exemplary practices was equally divided among the informal, both formal and informal, and formal rule process groups, reports of exemplary rule processes tended to be associated with the informal rulemaking states, while reports of exemplary materials were associated with formal or both formal and informal process states.

Since enforcement strategies of the rule process groups tended to differ, production of exemplary practices was examined as a function of enforcement. A high proportion of the states reporting little, or no, enforcement of their rules also indicated production of exemplary rulemaking practices. An examination of the responses made by these states shows that all but two had both formal as well as informal rulemaking processes. Some of the exemplary materials mentioned by these six coordinators during the interview, however, tended not to be Title I specific but produced as part of the formal rulemaking process in the state. In one state, all federal and state laws, regulations, and guidelines affecting Title I programs and the state's compensatory education were compiled in one handbook that was disseminated to all districts in the state.

It was hypothesized that states might develop exemplary rulemaking processes or materials (a) to overcome problems with the provision or (b) to fill a void left by ED, especially since the policy manual was never disseminated. While coordinators reporting no problems also did not report exemplary practices, the data show that presence of rulemaking problems was not related to reports of exemplary practices.

The production of no exemplary practices was associated with a neutral ED relationship. The presence of exemplary materials was associated with a more active relationship with ED--more than one-half of the states not reporting practices reported either a neutral relationship or no relationship at all over rulemaking issues. Thus, states did not appear to develop exemplary practices in the area of rulemaking to overcome problems or to overcome a hindering relationship with ED.

All of these relationships are presented in Table 28.

Production of exemplary practices could not be mediated by any state demographic characteristics, including years of experience of the coordinators or percent of time spent in rulemaking activities. This latter observation is surprising, since both of these latter variables--years of experience and the percent of time spent on rulemaking--were related to the numbers of quality design rules reported by states.

In summary, while practices tended to be reported by the active rulemaking states--those initiating rules, those beginning to make rules prior to 1978, those making numerous quality design rules--these states were not categorized as highly active in all areas. For example, they tended not to report the use of rules to help strengthen their program administration nor did they tend to enforce all of their rules. They also tended to be formal users or have both formal and informal rulemaking processes. This mixed activity pattern may thus account for the lack of state demographic trends observed here.

Table 28

Exemplary Rulemaking Practices as a Function of State Activities and Attitudes

Presence of Exemplary Practices	Number of Quality Design Rules		Rule Enforcement			ED Helpfulness			
	Low(0-1)	High(2 or more)	None	Some	All	Hindered	Somewhat Helpful	Helpful	Not Consulted
No	21	5	1	5	19	2	1	9	13
Yes	4	7	3	3	5	0	1	9	1

Continuation

At the end of the rulemaking section of the interview, state Title I coordinators were asked whether they would continue to include the making of rules as part of their program management if there were no or limited provisions in the Title I law for them to do so. Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As part of the interviews conducted onsite to a representative sample of 20 states, statelevel personnel were queried specifically about their continuation plans under Chapter 1. By this time, the Chapter 1 requirements were a little better understood, and state coordinators were beginning to make plans as to what aspects of their Title I practices would or would not be included as part of Chapter 1 management.

The discussion on continuation plans is presented in two parts. The speculative answers provided by the 49 Title I coordinators during the telephone interviews will be summarized and interpreted first. The information obtained from the 20 state Title I coordinators in response to specific probes about their Chapter 1 rulemaking plans are presented next.

Rulemaking Plans: A Speculation

The answers of the coordinators to the theoretical question, whether they would continue to include rulemaking if it were not expressly permitted by law, are summarized in Table 29.

From the table it is apparent that most coordinators report that they would plan to continue to make rules, even if rulemaking were not expressly permitted by law. Continuation of rulemaking for at least 17 of the respondents is expected to take the same form as is at present, with special attention paid to including rules on program quality, targeting and student selection, and funds allocation provisions (particularly comparability and supplement not supplant). A sizable number of states, however, would like to modify their rulemaking practices to include only informal rules, which are essentially nonenforceable, or to rely on state government for their rulemaking authority.

Table 29

Rulemaking Continuation Plans

Plan	Number of States	
• Don't know/Don't use now	9	
• Not continue	3	
• Continuation (plans unspecified)	10	
• Similar to current practice	17	
– Make rules on program quality		5
– Make rules on targeting and student selection (including private schools)		4
– Make rules on funds allocation provisions		3
• Modified practices	2	
– Make only informal guidelines that may not be enforced		2
• Different practices	8	
– Rely on state authority to make rules as needed		6
– Other practices, such as		5
: include LEAs in rulemaking decisions		
: make rules only if threat of audit exception arises		
: allow SEAs the power to make whatever rules are necessary, which may mean waiving requirements of federal law (e.g., prohibit personnel unfamiliar with Title I to be audited)		

Four kinds of qualifications to this question are of interest. Seven state coordinators believed strongly that they always had the power to make rules, regardless of whether a rulemaking provision existed in the Title I law. They felt that, because they had the oversight responsibility to ensure that their district programs were legal and of sufficient size, scope, and quality, they were entitled to make whatever rules were necessary to achieve this outcome. It is not surprising to observe that these coordinators were extremely active in their rulemaking, having made rules even prior to 1978, and they tended to initiate informal rules themselves or in consultation with their districts. Several of these coordinators proposed other different rulemaking practices, such as allowing SEAs to have the power to make whatever rules are felt to be necessary to operate the program, even if it means waiving federal requirements.

Nineteen coordinators commented that making rules may become more important in a less prescriptive law. These coordinators presented a less active rulemaking profile as they were fairly evenly divided among the active and minimal rulemakers: A large proportion of them made rules only prior to 1978, they tended to rely on formal or both formal and informal rulemaking processes, and they tended to take the initiative themselves to make rules. While a subset of these coordinators plan to change their rulemaking practices (e.g., not to continue, continue only with informal guidelines, or have rulemaking powers transferred to state government), most plan to continue rulemaking activities similarly to what they have done in the past.

Eleven state coordinators felt strongly that rulemaking on the part of states was not needed if the federal personnel continued to make large numbers of rules. They pointed to the case of the 1978 Title I law and indicated that there was very little need for additional rules, since there were "too many rules and regulations already." Not surprisingly, these coordinators tended to be less active rulemakers or non-rulemakers, many of whom tended to have access to both formal and informal rule processes. They were evenly divided in their rulemaking activities prior to 1978 and both before and after 1978, and they were evenly divided in taking the initiative themselves to make rules or in making rules only in response to requests from their districts or from federal personnel. This mixed profile of activity and non-activity also appeared in their continuation plans, since the more active ones of the group tended to report continuation of rulemaking along similar lines, while the other one-half of the coordinators wanted to modify their practices--either not continue with rulemaking, make only informal guidelines that may have no enforcement attached to them, or have different practices (e.g., making rules only if requested by districts). The lack of activity may also reflect the attitudes shared by some states that program design issues should be left up to local option. It should be noted, however, that many of these local control states were observed to make numerous informal rules.

Fourteen states qualified their answers reported in Table 29 by saying that their future continuation plans depended upon the wishes of state policymakers (N = 5) or depended upon a rulemaking provision being included in the federal law (N = 9). While it was not surprising that the coordinators reporting the former were minimal rulemakers, it was interesting that they tended to report taking charge of initiating rules themselves (as opposed to initiating rules at the requests of districts or federal personnel). The coordinators who reported a possible inability to make rules without an express provision tended to be active rulemakers who initiated rules themselves and who tended to make rules to help districts design quality programs. In both cases, the coordinators tended to propose continuing to make rules similarly to current practice; in three cases, the coordinators wanted to include rulemaking as part of the authority of their state government.

A comparison of the states reporting no continuation of rulemaking, similar practices, and different practices is presented in Table 30. It is evident from this table that the states planning not to continue

Table 30

Rulemaking Continuation Plans: Comparison of States

Variable	Continuation Plans Not Continue (N=3)	Similar (N=17)	Different (N=8)
Rule use	No active rule users	Primarily active, some minimal	Equally active and minimal activity
Extent of rule use	No use of rules after 1978	Use before and after 1978	Use before and after 1978
Initiation of rules	Divided between state influence and federal	All are state or state/local influence	Mostly non-state influence (district, federal)
Rule process	Primarily formal	Primarily minimal and both informal & formal	Equally divided among the 3 groups
Enforcement	All rules enforced but weakly	Primarily enforcement of all rules; a few enforce no or some rules	Divided among "some" or "all" rules enforced
Enforcement Strategies	Application approval	Application approval Monitoring Auditing or withholding Coercion If challenged, may back down	Monitoring Auditing Backing down only reported by 2 states enforcing only some of their rules
Use of rules to strengthen program administration	No	Primarily Yes	Evenly divided between Yes and No
Quality design rules developed	None	Yes, and 7 states are extremely active: Staff-pupil ratios Instructional time Needs assessment Staff inservice Parent involvement Education aides Evaluation	Yes but only 1 state is extremely active: Staff-pupil ratios School-level plans Staff qualifications
Monitoring for program quality	Some, but none are active	Yes, and 8 states are active	Yes and 4 states are active
Presence of problems	No	Yes--(two-thirds)	Some--(one quarter)
Presence of exemplary practices	One state	Yes	Yes
Ratings of rulemaking	No rulemaking ratings of substantial importance	Mostly "substantial" and "moderate" ratings of rulemaking importance	Mostly "moderate" ratings of rulemaking importance
Helpfulness of ED in the area of rulemaking	No positive or negative interactions on rulemaking issue	Evenly divided between helpful and neutral (or no) consultations on rulemaking	Generally helpful, but some negative and neutral (or no) consultations on rulemaking
Type of organizational structure	Decentralized	Mostly independent, many with regional offices	Mostly independent

rulemaking generally have an inactive profile, the states planning to continue making rules in a similar way have an active profile, while the states planning to continue rulemaking using different practices present a mixed active-nonactive profile. An examination of the data from the "Don't know" or "No use now" states on these variables shows responses that are very similar to the states planning not to continue making rules. Thus, one would predict no continuation of rulemaking for the non-rulemaking states and those states indicating that they are not sure whether they will continue to make rules or not. An examination of the responses of the states planning to continue making rules but using nonspecified practices shows a response pattern like the states reporting continuation using "similar" practices.

One might therefore expect these nonspecified states to continue rulemaking activities that are similar to what they do now: they currently tend to be evenly divided among active and minimal rulemakers, all initiate rules themselves (or with their districts), and they tend to make rules to help districts design quality programs.

Rulemaking Plans: Preliminary Views of Chapter 1 Impact

During subsequently conducted onsite visits to a sample of 20 states, the Title I coordinators were asked specifically whether they plan to continue making rules under Chapter 1, how their activities might change, and what problems they might anticipate in making rules. While these interviews took place prior to the effective implementation date for Chapter 1, most states had begun to make plans for the change to Chapter 1. If states indicated they were unsure of their continuation plans, they were probed to ascertain what additional information they felt they needed before they could make a decision. So that the comments made by these state coordinators can be placed in perspective, the rulemaking activities of these 20 states are summarized (as shown in Table 31). Since states were selected to represent a nationally representative picture on the basis of several demographic variables, and not on the basis of their interview responses, it was important to determine to what extent these states used rulemaking in the past before looking ahead to their Chapter 1 plans.

Even though many months lapsed between the initial and follow-up interviews for some states, states did not tend to change their positions much during this interval, although the changes mentioned were always in a less active direction: Two states changed their previously mentioned continuation plans from "yes" to "don't know;" three others qualified their earlier responses by adding they would make rules "only when it was essential." One state coordinator, who previously indicated he would not make rules modified his statement by adding that he would like to make some informal rules (which may not be enforceable), but his State Board may not allow him to make any rules that are not expressly encouraged.

Table 31

National Sample of 20 States: Description of Past Rulemaking Activities

Variable	Number of States	Variable	Number of States
● Rulemaking		● Rule Influence	
- None	3	- State	11
- Minimal	8	- State/local	4
- Active	9	- District	1
		- Federal	2
● Rule Process			
- Informal	5	● Number of Quality Design Rules	
- Both	8	- 0 - 1	14
- Formal	5	- 2 or more	6
● Extent of Rulemaking		● Initial Continuation Plans[a]	
- None	3	- Not continue	3
- Prior to 1978 only	5	- Similar/Yes (unspecified)	11
- Both before and after 1978	9	- Modified	1
		- Different	4
- After 1978 only	1	- Don't know	1

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[a] Data collected during initial telephone interviews

Impact of Chapter 1 on Rulemaking Continuation Plans

Many of the coordinators expressed uncertainty about what states could actually do in the area of rulemaking. While the Chapter 1 law (P.L. 97-35) was available to states early on, the supporting interpretive materials, such as Department of Education's Questions and Answers, the various drafts of the Chapter 1 informal nonbinding guidelines, and the Chapter 1 draft regulations, were not released until most of the onsite interviews were mainly completed. Despite the fact that the coordinators were exposed to different amounts of information and interpretations on the Chapter 1 law, the impact of Chapter 1 was manifested in three major rulemaking questions:

- What is the authority of states under Chapter 1 to make rules?
- What authority do states have to enforce rules under Chapter 1?
- How will Chapter 1 change states' current rulemaking activities?

Chapter 1 rule authority. States disagreed as to whether they had authority to make rules if a rulemaking provision was not expressly included in the law. Since the rulemaking provision was not in the law itself but added later to the draft Chapter 1 regulations, many states interviewed early were concerned over this issue. Some states felt that the authority to make rules was implied in the application approval function: Since they had to ensure valid programs of sufficient size, scope, and quality, states had to be able to make whatever rules they felt were necessary to achieve this outcome. Others disagreed, saying that they would be unable to make rules unless the law gave them express authority to do so. A few states with formal rulemaking processes indicated that their State Boards or state policymakers might not allow them to make rules, if the law did not grant them specific authority, since the philosophies of these states were "nondirective." Thus, Title I rules would be perceived as "directive" and counter to educational policy in the state.

States--even the nondirective ones--generally wanted to be in control of the program and to have the power to act if program quality declined or if Chapter 1 funds were misused. They resented the vagueness of their role as specified in the Chapter 1 law. They also felt they could not rely on the Department of Education for much guidance in this area, since a federal role was also vague in the Chapter 1 law. The lack of possible direction from the federal personnel--either in clarification of their responsibility or in providing technical assistance to help them decide what kinds of rules were within the scope of the regulations--was interpreted by states to mean that they would have to provide whatever guidance their districts needed themselves. It will be the coordinators and their staffs who will be accountable to answering their districts' questions. Some accepted this role enthusiastically, saying that they have considerable knowledge of programs gained over the years, which they can share and which LEAs did not have the opportunity to gather. Others accepted the role grudgingly, by indicating they will make whatever rules are minimally needed to clarify what practices are acceptable to avoid audit exceptions. Still others indicated that they plan to make no rules or interpretations but to provide alternative strategies for implementing a particular provision and leave the selection of a strategy up to the LEAs.

Once states began to define their rulemaking roles, questions arose concerning the extent of their authority. If states believed that they had the authority to make whatever rules are necessary to implement valid programs, could they add back in all of the requirements from the 1978 Title I law, i.e., the flexibility afforded by the prescriptive Title I provisions, in their Chapter 1 rules? While no one wanted to add additional layers of red tape, they did want to make rules to include some of the provisions of the Title I law, namely noninstructional duties and schoolwide projects, which they felt would strengthen their program management.

The extent of states' rulemaking authority apparently came to a head in Spring 1982 over the issue of Parent Advisory Councils (PACs). Several state Title I coordinators indicated that they wanted to use their rule making authority to require that all districts (or schools) have PACs, since they strongly believed that councils are a good way of involving parents. They reported that ED forbade them to mandate councils, because such a mandate was felt to violate the intent of the Chapter 1 law. One state responded to this response by reluctantly dropping its plans to rule on PACs; another proposed to include PACs in a state rule; still another contemplated a rule that required districts to have periodic consultations with their parents and to keep records of these consultations--that is, councils, but the word "council" was never to appear in the rule.

Chapter 1 rule enforcement. The extent to which Chapter 1 rules can be enforced is still an issue of concern to states. Many are dissatisfied with the information provided by ED to date in this area. The concerns center around several questions:

- Can states enforce their rules by withholding funds? Since states disagree as to whether they have the authority under Chapter 1 withhold funds, they disagree as to whether this enforcement sanction applies to their Chapter 1 rules.

- If states make rules, will the auditors use these state standards when they audit? Some states fear that federal auditors may not interpret federal law to concur with state rules. On the other hand, states that rely solely on informal rules that may not be enforceable expressed concern that, if state rules are used as standards by federal auditors, they may be held accountable for all of their rules. Thus, fear of audit exceptions, which drove much of the rulemaking activities prior to 1978, may stifle much of the rulemaking under Chapter 1.

Because informal rules may not be enforceable by states, especially under Chapter 1, two states with informal rules reported creative ways of coping with this problem. One state assembled a committee consisting of state policymakers, district personnel, and parents to review the law and to decide on what areas rules should be made. The committee felt that the Title I law was good as it existed in 1978. They believed that rules needed to be made in the areas of evaluation and PACs. They plan to formulate rules in these areas, which they hope will go through the public hearing process and eventually be approved by the State Board. Thus, no future disagreements should exist over enforcement of these rules. A second state indicated its informal rules could not be enforced due to the nondirective philosophy espoused by the state. However, if LEAs follow the informal rules made by the Chapter 1 coordinator, the SEA will support the districts if they receive future audit exceptions. If the SEA is challenged by an LEA and is forced to back down in its enforcement, the SEA may not support the LEA if it receives future audit exception. If districts are aware of this policy, enforcement of informal rules may not be difficult.

Impact on state activities. States have responded to the vagueness of the rulemaking authority in several ways. Some definitely appear to be "running scared"--they plan to make rules only if problems arise or out of fear of an audit exception. These states generally plan to make rules only if they receive full support of their policymakers.

Other states have adopted a "wait and see" attitude--they plan to make few, if any, rules during the first implementation year. Later, at the requests of their districts, they will make more rules.

One interesting response that was mentioned by a sizable number of the coordinators was that rulemaking was very dependent upon acceptance by their districts and their state policymakers. Thus, they planned to involve representatives of these groups more in the planning of which rules should be made. Undoubtedly, rule enforcement in these states should be facilitated if they have the support of all constituency groups at the outset.

One group of states that bears future observation are the nondirective, "local control" states. Some of these relied on the prescriptive Title I law to make their rules for them. While some were classified as active rulemakers by this study, they relied primarily on the use of informal rules--some of which were inserted indirectly into application instructions or monitoring checklists. While these coordinators may have favored relaxing of the federal requirements, they may now find themselves in the position of not being able to provide any direction to their districts-- both because any state rules would appear more "obvious" to their districts and because these "directive" rules would appear counter to their state philosophies. Furthermore, with cutbacks in available administrative funds, which may also mean a loss of staff for states, much reliance on large amounts of onsite, personalized technical assistance to further program development may be difficult.

Possible Rulemaking Problems Under Chapter 1

Three basic problems were reported by state coordinators in anticipation of making rules under Chapter 1:

- Possible conflict with State Boards. Chapter 1 coordinators who felt that certain rules are necessary to prevent a decline of program quality and to prevent misuse of Chapter 1 funds may find themselves forbidden or discouraged from making rules by their nondirective State Boards.

- Possible conflict with districts. Some states believe that rulemaking does not help SEA-LEA relationships. Thus, these states do not want to make many rules but do want to exercise enough control over the districts to give them whatever guidance they will need to implement valid programs. Other states reported that their districts will be watching them carefully to make sure that they do not put back in all of the requirements of the 1978 Title I law. For those states making rules may be extremely difficult.

- Possible enforcement problems. Since authority to make rules is still unclear, the authority to enforce them is also unclear. States generally seemed to feel that informal rules may be more difficult to enforce than in the past. They either will have to "bluff or back down" or try to get their informal rules passed using a formal rulemaking process existing in the state.

Some states hoped that, if their rules were defensible, were based on good common sense, and careful reasoning, they would not have any enforcement problems.

State Rulemaking: A District Perspective

Since rulemaking was such a controversial issue with the state Title I coordinators, particularly regarding the issue of "local" control, districts were queried to ascertain if they could differentiate between state-generated rules and the federal requirements.

Table 32 presents a summary of these perceptions as a function of states' rulemaking use as defined by this study.

Table 32

A District Perspective of States' Rulemaking

District Differentiation of State and Federal Rules	States' Use of Rulemaking Authority		
	None	Minimal	Active
No state rules made	9	6	0
No	0	4	6
Yes	0	11	16
Don't know	0	2	2

As apparent from this table, when states make no rules, districts tended to be aware of this fact. In two states, six districts reported that their states made no rules, which was close to the truth--in both cases, these states made a few rules solely to clarify existing federal requirements. When states were active rulemakers, their districts also tended to recognize their activities in this area.

However, when the districts were asked whether their states made rules over and above what is required by federal law, only 22 indicated affirmatively, while 19 districts did not.

Many districts had difficulties differentiating state from federal rules. Some even attributed federal rules to their states. When they were pressed to give examples of a "state" rule, rules in the following areas were mentioned:

- designation of a particular per-pupil expenditure (e.g., $300 per child),
- definition of acceptable/unacceptable conference attendance,
- establishment of particular pupil-teacher ratios,
- requirement to use pullout-type programs,
- requirement that districts (not the state) must pay for fiscal audits,
- requirement that districts must employ external evaluators,
- selection of students below a particular cut-off percentile,
- requirement that state approval must be received prior to hiring any consultants,
- establishment of teacher/aide certification requirements, and
- all completion dates for application, evaluation, etc.

Some of the districts that reported state rules over and above the federal requirements felt that their states used a more restrictive interpretation of federal requirements, generally, in part to keep them from receiving audit exceptions. While most of them were not able to provide any specific example, a few did. They indicated rules as follows:

- additional requirements in the area of parent training,
- a residence requirement for principals before they can vote in PAC elections,
- requirements about location of instruction for private school instruction.

A fairly sizable group of districts that reported examples of state rules actually misattributed federal rules to their states. The areas most frequently mentioned were:

- Parent Advisory Council requirements,
- sustaining gains provisions,
- private school participation requirements,

- the need for annual application updates, and
- targeting requirements.

It is noteworthy that all of these provisions were extremely detailed and rather prescriptive in the 1978 Title I law. It may be that districts believed thiat their states _must_ have been involved in making these requirements, since so many details were prescribed.

Since these provisions also tended to cause problems for the districts, it is surprising that some states did not "disown" these requirements as federal ones in order to preserve a less directive image in front of their LEAs.

Districts were less able to differentiate between few and many rules made by states to help LEAs design quality programs, but districts were able to differentiate on the basis of rule _content_ as shown in Table 33.

As pointed out earlier in this chapter, states made what was referred to as "quality design rules," which reflected those rules pertaining to:

- staffing (staff-pupil ratios, staff qualifications, staff inservice requirements) and
- instruction (time, approach, evaluation, coordination with regular program).

Table 33

Number and Content of State Rules as Perceived by Districts

Does State Make Many Rules Over Federal Requirements?	Numbers of State Rules Made to Help Design Quality Programs		Number of State Quality Design Rules	
	Low (0-2)	High (3-4)	Low	High
No	9	10	15	4
Yes	9	13	10	12

Since some of these rules apparently were problematic for districts and were ones listed by LEAs as examples of state rules, the observation in Table 33 is not unexpected.

Twenty districts indicated that there were areas in which they would like to see _fewer_ rules, while twenty-four did not. Many of these areas, however, were federal requirements, particularly:

- Parent Advisory Councils;

- evaluation;

- private school participation;

- supplement-not-supplant, comparability, and target area selection;

- program audits; and

- selection of educationally disadvantagaed children.

Fewer areas of legitimate state rulemaking were mentioned:

- primarily residence requirements for voting on PACs,

- a general dissatisfaction with the state's interpretation of the federal requirements,

- teacher certification,

- state too "picky" about budget details, and

- have state give more consideration to inclass (not pullout) programs.

While less guidance was desired by some districts, seven districts indicated areas where they felt more guidance was necessary:

- better standards for defining acceptable conference attendance,

- more guidance on use of inclass programs,

- more guidance on how to design and monitor junior and senior high school Title I programs,

- more guidance on use of evaluation data to improve programs,

- more interpretation of private school participation,

- more interpretation of acceptable duties for noninstructional personnel, and

- more clarification on serving Special Education children.

In summary, while districts were generally able to know when their states exercised their rulemaking authority, they were less clear about exactly which rules were state-generated and which were federal requirements. In the specific area of improving programs, however, districts did perceive correctly when their states made few or many rules in this area.

While districts expressed dissatisfaction with some of the rules they perceived, much of their dissatisfaction actually lay with the federal Title I law, although the districts were unaware of this fact.

It had been expected that some states classified as active rulemakers, which also labeled themselves as "local" control, might have worked hard to make it clear to their districts which rules belonged to them and which belonged to the "feds." In examination of the responses made by districts in these local control states shows, however, that the PAC requirements were high on the list of rules that districts felt were too restrictive. Thus, it is interesting that these states were particularly sensitive to presenting a non-directive image, yet perhaps were unaware that some of their districts held them accountable for the federal requirements.

APPLICATION APPROVAL

APPLICATION APPROVAL

Chapter Highlights

In 1978, Congress gave states an opportunity to reduce paperwork by using a three-year application approval cycle. The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the application approval provisions included in the 1978 law (and the 1979 and 1981 regulations):

- To what extent did the application approval provisions, particularly the introduction of the three-year cycle, affect states' administrative practices?
- To what extent was the application approval process interrelated with other state responsibilities as intended by Congress?
- What problems did states encounter in implementing the provision?
- Did the provision stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to use application approval in the same way as is at present, if this authority were not expressly permitted by law?

The option to use a three-year application approval cycle has proven to be popular: 33 states use the three-year cycle. Making the three-year cycle "work," however, is a nontrivial matter. Eleven of these states felt that their paperwork and that of their districts had not been reduced by use of the cycle. Nineteen of these states, on the other hand, felt that paperwork was reduced for both them and their districts. Three states believed that the cycle had reduced paperwork only for their districts.

There is substantial variation in how states implemented the three-year cycle, particularly how they handled the problem of annual updates. States that were successful in reducing their paperwork through use of the three-year cycle were characterized as having an active, problem-solving management style. These successful users of the three-year cycle can be characterized as follows.

- Successful users were especially clear in saying that a model application format would not be of value to them, since they already have in place a system that works.
- Successful users were likely to develop exemplary practices.
- Successful users enjoyed a more positive working relationship with the U.S. Department of Education.

The active management style of the successful users of the three-year cycle was also characterized by greater use of personalized (rather than less personalized) technical assistance service delivery mechanisms and greater activity in the use of parent involvement.

Under ESEA Chapter 1, Title I coordinators wanted to consider streamlining the application approval process to reduce districts' paperwork and to facilitate the approval process. While some coordinators wanted to rely more on assurances to achieve this goal, others strongly did not. Coordinators not wanting to use assurances felt that they would be unable to make the necessary compliance determinations required of them by law. Other states plan to reduce the application burden under Chapter 1 by continuing to use a consolidated application, which includes Chapter 1 in addition to other state and federal programs.

Some Title I coordinators were unsure whether they had the authority under Chapter 1 to include items on their application if they were not expressly provided by law.

All of these states believed strongly that the application approval process was extremely important. While they wanted to comply with the intent of Chapter 1, namely to reduce paperwork and administrative burdens on their districts, they were not generally desirous of trading rigorous collection of information on the application to be assured that their districts were in compliance for assurances, which would only provide simplicity of administration. Most, however, were willing to explore other ways (other than assurances) in which this goal could be met.

Introduction

In the three-tiered administrative structure that was established by Congress to facilitate Title I program management and compliance, state agencies played a critical role in ensuring the federal Department of Education and the public that Title I funds appropriated by the federal government were utilized by local projects in accordance with the intent and the terms of the law. States were vested with the responsibility of approving local project applications to ensure that districts complied with all of the Title I fiscal and program requirements. With this arrangement, the federal government received assurance of state and local program compliance from the SEAs by way of the LEA applications.

The importance of the application approval process in Title I was recognized by the Committee on Education and Labor during the hearings that preceded passage of the Education Amendments of 1978:

> Application approval is perhaps the most important function performed by state educational agencies under Title I. It enables the state educational agency to determine whether an applicant agency has complied with applicable program requirements before the applicant agency implements the program or projects described in the application. (p. 42)

In practice, the LEA application serves a variety of functions. Many districts, for example, feel that it is an important planning document. In the course of completing the application, local project staff must make many decisions regarding program operations and expenditures of federal funds. Valuable coordination among Title I and regular classroom personnel are often needed to prepare the description of project activities that is included on the application. The completed application also provides a measuring post against which projects may examine themselves in terms of progress made to achieve their objectives.

For state agencies, the LEA application is also a valuable document. During the application approval process, state Title I staff often assist districts with or participate in various planning activities. This early contact facilitates state-local relations that may be critical to the operation of this program and to successful future SEA activities in the district. Often this contact provides SEAs with an opportunity to oversee the quality of the program design and to provide technical assistance to improve planned local services to eligible participant students. In addition, the LEA application is also a major ingredient of the SEA enforcememt system. In approving applications, the state assumes responsibility for reviewing the planned project for compliance with all applicable requirements prior to the expenditure of federal funds. Once approved, the application serves as an agreement between the SEA and the LEA that the project will be conducted as specified and as approved and therefore federal funds will be spent legally. The application may later be used during monitoring and auditing to check that the LEA has implemented the project as approved. As such, the approved LEA application has been viewed as a legally significant document, not unlike a contract or an agreement, the breach of which places the SEA in the position of enforcing compliance through delay or withholding of future application approval or through use of other enforcement sanctions (Gaffney, Thomas, & Silverstein, 1977).

The importance of the approved application as a legal document cannot be underestimated. Many districts rely upon it, to some extent, as a form of protection from gross violations that might otherwise be cited in audit exceptions. That is, a project that is conducted in conformance with the approved application should be substantially in compliance with all applicable federal and state requirements. As evidenced by SEA negotiation and revisions to LEA applications, the SEA approval process has made tremendous contributions to the level of compliance among operational Title I projects.

The legislative language related to approval of district applications, while not changing dramatically since the inception of Title I in 1965, has resulted in an expanded role for states over the years and in an increased importance for the application approval responsibility. Under P.L. 89-10, states were to receive, review, and approve district applications that described activities to be conducted with federal funds to cover one year of program operation. Before approval was given, the state had to determine that the planned LEA project was in compliance with applicable requirements; and the state had to provide the LEA with an opportunity for a hearing if the project were disapproved. Section 164 of the 1978 Title I law expanded the state role in application approval by specifiying an interrelationship between this responsibility and other state responsibilities. Specifically, prior to approval of an application, states must review and take into consideration pertinent federal and state audits, ED program reviews, monitoring reports, complaints of non-compliance, and evaluations. Thus, the LEA application was intended to become the focal point for program administration.

The expanded state role stemmed, in part, from a history of problems with states' approval of applications. Since states design their own application forms and procedures, it has been observed that the extent to which applications meet the various legal requirements varied. As noted by the House Committee on Education and Labor, "some states' application forms request only limited information from local school districts and may result in these states approving programs that do not meet all requirements" (Report 95-1137, p. 41).

While the requirements relating to states' responsibility for approval of LEA applications underwent some change between 1965 and 1978, the number of determinations states needed to make to ensure that LEAs were meeting the necessary requirements increased over the years. Section 141(a) of the 1974 Title I legislation presented the LEA requirements that had to be met prior to SEA approval. These provisions pertained to:

-- Funds Allocation

- maintenance of effort
- excess costs
- supplement, not supplant
- comparability

-- Targeting and Eligibility

- designating school attendance areas
- private school participation

-- Program Design and Implementation

- purpose of program and program design
- needs assessment (implied)
- planning
- sufficient size, scope, and quality
- information dissemination
- training of education aides and professionals
- control of funds and property
- construction
- jointly operated programs
- accountability (reporting, recordkeeping, and access to information)
- individualized plans (encouraged)

-- Evaluation

-- Parent Participation

  - parent involvement
  - parent advisory councils

Several of the above requirements were combined in a few but very brief provisions in the 1974 law.

Sections 121 through 134 of P.L. 95-561, which contain the LEA requirements of the 1978 Title I law, fill 16 pages. The 1978 Title I legislation expanded on all of the earlier requirements and added the following ones:

- children to be served,
- schoolwide projects,
- expenditures related to ranking project areas and schools,
- teacher and school board participation,
- complaint resolution,
- noninstructional duties, and
- sustaining gains evaluation.

The addition of the above requirements resulted in an increase in the length, detail, and prescriptive nature of the law. Congress, however, intended to strengthen program management by providing SEAs and LEAs with clearer, more precise guidance for them to use in addressing areas of program need that were absent from previous legislation. The assumption was that increased specificity would lead to increased flexibility of state and local management of Title I programs. To demark clearly the state and local responsibilities regarding preparation and approval of applications, the authors of the 1978 statute introduced a cosmetic change as well--all state responsibilities and local requirements were grouped together and clearly labeled to facilitate easy reference.

As the number of LEA requirements expanded, so could the length, complexity, and burdensome nature of the LEA application. In fact, testimony presented at the 1978 hearings suggests that Congress was extremely sensitive to the excessive paperwork burdens placed on LEAs.

According to the House Committee on Education and Labor:

> A number of witnesses at the hearings held specifically on paperwork problems suggested that some of the Title I application and assurance requirements created unnecessary paperwork, in that most of the information collected changes very little from year to year. Testimony also suggested that this process diverts staff time away from actually operating and overseeing programs. (p. 19)

In recognition of concerns among Title I program managers of excessive paperwork burdens and the new demands placed on LEAs by the 1978 law, the 1978 Title I law was written expressly to reduce paperwork by permitting the use of a three-year LEA application cycle, with annual updates or amendments representing only program changes. This change meant that the LEAs might need to complete lengthy and detailed Title I applications only once every three years, and, during the subsequent two years, they might need to submit only brief documentation of budgetary information and descriptions of any program changes that might result, for example, from incorporation of evaluation or needs assessment findings, or changes in the population served.

The effect of these legislative changes on state administration was twofold. First, the 1978 Title I law allowed for a reduction in the number of district applications that a state agency must process each year. Second, the law specified that particular state and federal documents are to be consulted before approval can be granted. This requirement was to help SEAs improve their application approval procedures and to encourage them to use the application approval process as a basis for their program administration, which would include the other state responsibilities of monitoring, providing technical assistance, evaluating, and resolving complaints.

The regulations for the 1978 Title I Amendments, which were to provide additional guidance on the implementation of the Title I programs, were first published in 1979[1]. By way of Congressional resolution, the issuance of final program regulations was delayed for a number of reasons; chief among them were complaints that the draft was "confusing, misleading, incomplete, and in some respects incorrect," that it could not be "understood without reference to at least five other documents," and that it was lacking in required "standards" and examples that explain the manner in which the regulations operate" (Committee on Education and Labor, 1979, p. 2). Between 1978, when Title I was amended, and 1981, when final regulations were issued, SEAs and LEAs had to rely upon the language of P.L. 95-561, guidance or ideas they could obtain from ED or infer from the proposed regulations, and other binding requirements, such as the General Education Provisions Act (GEPA) and regulations, and the Education Department General Administrative Regulations (EDGAR). The Policy Manual, which was to provide states with sample application formats and supporting materials, was never published.

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[1] The regulations that provided additional information and guidance on the evaluation of Title I programs were published separately from the program regulations. The final evaluation regulations were published on 12 October 1979.

In 1981, the final Title I regulations were issued. They clarified the previous draft, incorporated the other applicable requirements referenced in the draft, and provided standards and examples for certain responsibilities. The response to the final regulations on the part of the program people who had requested the changes was not positive:

> "...state and local education agencies pleaded for self-contained regulations. When they got the regs, they pointed with horror to how long and burdensome they were" (Robinson, 1982, p. 4).

The 1981 final Title I program regulations were lengthy and quite detailed, providing substantial guidance for implementation of the 1978 legislation, including application approval.

Sections 200.110 through 200.113 relate to SEA approval of LEA applications. These regulations specify standards for approval, factors to be considered in approval, effective date of approved application, procedures related to opportunity for a hearing on application disapproval and appeal to ED, and contents of amendments and updates to the application. While many of the regulations echo the language of the statute, considerable elaboration for implementation is provided. In addition, regulations on amendments to the application stipulate that annual updates contain, at a minimum, assurances on maintenance of fiscal effort, amount of carryover funds and funds requested, and a budget of expenditures of Title I funds. It further provides information on what application amendments are necessary to document specific program changes. Perhaps the greatest expansion of the 1981 regulations was to the LEA requirements. For every LEA requirement of the statute, lengthy and detailed guidance was incorporated in the regulations, purportedly to increase administrative flexibility and to provide sufficient implementation examples.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the application approval provisions included in the 1978 law (and the 1979 and 1981 regulations):

- To what extent did the application approval provisions, particularly the introduction of the three-year cycle, affect states' administrative practices?

- To what extent was the application approval process interrelated with other state responsibilities as intended by Congress?

- What problems did states encounter in implementing the provision?

- Did the provision stimulate states to develop exemplary practices or materials in this area?

- To what extent would states anticipate continuing to use application approval in the same way as is at present, if this authority were not expressly permitted by law?

Title I projects operated under the 1978 statute and 1981 regulations for only a brief time when, as a result of change in federal administration and administrative priorities, the Education Consolidation and Improvement Act was passed.

ECIA Chapter 1 contains substantially fewer requirements relating to LEA application approval. Section 556 of the new Title I law requires LEAs to have an approved application on file in the SEA, which covers not more than three years and which describes the local program. The SEA may approve applications when satisfactorily assured that the LEA will keep records and provide such information to the SEA as may be required for fiscal audits and program evaluation. Certain local requirements must also be met:

- targeting attendance areas;

- conduct of needs assessment;

- identification of children to be served;

- design of projects of sufficient size, scope and quality;

- consultation with parents and teachers;

- conduct of evaluation and sustained-effects studies; and

- participation of private school children.

In designing LEA applications that provide satisfactory assurance of compliance with these requirements, the SEA appears to have considerable flexibility in determining the amount of information it requires. Thus, the last section of the application approval part of the interview, namely the theoretical question of states' intentions under a less prescriptive law, took on added significance.

In February 1982, ED published the Proposed Regulations on ECIA Chapter 1. In Sections 200.12 through 200.14, the Proposed Regulations reiterate and expand the requirements of the law regarding LEA applications and SEA approval. The primary addition made is a requirement that LEAs submit annual updates showing that the fiscal effort was maintained and presenting a budget for the upcoming project year. These regulations provided guidance to SEAs as they began to develop their Chapter 1 applications.

This chapter summarizes the findings of the State Management Practices Study to the questions listed above. Also included in this discussion are states' preliminary views of the impact of Chapter 1 on their future application approval activities. The chapter concludes with opinions of a sample of districts to their states' use of the application approval process.

Issues related to the three-year cycle, and its perceived impact on paperwork reduction, turned out to be the theme running through most of the comments made by the coordinators to the questions in this section of the interview. Because of this fact, this chapter will be organized differently from the others in this part: All of the findings pertaining to the three-year cycle will be discussed in one section of this chapter, even though they cut across the study questions listed above. All of the other findings will be discussed under their appropriate headings.

Use of the Three-year Cycle

Implementation

In this section, states' implementation of the three-year cycle for approving applications is described. Basic descriptive statistics are presented as well as correlates of use of the cycle. Finally, some ideas on how well the three-year cycle is working are given.

An important change allowed by the 1978 Title I law has been the option for states to use the three-year cycle for approving district applications together with annual updates. This change was made to help states and district personnel reduce their paperwork. This option has proven to be popular; 33 states report using the three-year cycle. Of these, 7 states began using the three-year cycle in 1978-1979, 20 in 1979-80, and the remaining 5 in 1980-81. Eliminating the requirement of annual applications also permitted states to stagger the submission of applications. Only 5 of the 33 states using the three-year cycle stagger submissions. This strategy was apparently successful, as four of these states reported reduction of paperwork for both them and their districts. Some of the states that do not stagger submissions happen to have so few LEAs that the idea does not make sense, but many other states on the three-year cycle are quite large, and their reasons for not staggering submissions are not clear.

Since Congress gave states the option of using the three-year cycle as a means of reducing paperwork, it was hypothesized that the larger states would select the option since they would have more paperwork to process. However, use of the three-year cycle turned out to be unrelated to almost all major demographic size variables, including the number of LEAs, total state educational revenues, funds for state administration, state population, number of SMSA's greater than 25,000, number of SMSA's greater than 100,000, as well as several measures of the size of the Title I state staff. Use of the three-year cycle was correlated only with population density (number of persons per square mile): States using the three-year cycle had greater population density than those that did not attempt it. Since use of the cycle did not correlate as expected, it suggests that the reasons for states' use of the cycle are more complex and varied than originally anticipated.

The idea that the larger states would choose to use the three-year cycle is, of course, based on the assumption that this option is perceived as a mechanism for achieving paperwork reduction. If states have other perceptions, then this hypothesis would not be expected to hold. As the following discussion makes clear, states have widely varying experiences with and opinions about the value of adopting use of the three-year cycle. These opinions and experiences prove to be important mediating variables; consequently much of this chapter deals with them.

Although over 60% of the states used the three-year cycle, the data indicate that this option has not been entirely successful. State Title I coordinators that reported using the three-year cycle were asked whether they believed it had reduced paperwork either for themselves or for their district personnel. Table 1 displays the crosstabulations of the responses to these two questions. It is evident that a substantial proportion of those states using the three-year cycle report, in effect, that it is not working for them or for their districts. In fact 8 of the 11 states reporting no paperwork reduction for either the SEA or their LEAs said that annual updates involve as much work as preparing and processing a new application. A few states were extremely vocal on this point, calling the three-year cycle a "farce" or saying that it is just not working to reduce paperwork burden as they had expected.

Table 1
Reports of Paperwork Reduction by Users of Three-year Cycle[a]

Reduction in Paperwork - SEA	Reduction in Paperwork - LEA	
	No	Yes
No	11	3
Yes	0	19

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[a] Data from 16 states that are not using the three-year cycle are not included.

The issue of paperwork reduction was also of concern to states not on the three-year cycle. Of the 16 state Title I coordinators that reported not using the three-year cycle, 10 said that they were not using it because they felt annual updates would be just as much work. Several felt that the law required that the updates contain too much information to permit an appreciable reduction. Others said that their LEAs modified their programs annually and would need to submit revised program descriptions anyway. Thus, the degree to which the three-year cycle would reduce paperwork was a dominant concern for both those using the cycle and those that did not.

In contrast, several of the coordinators whose paperwork had been reduced for both them and their districts indicated that the paperwork reduction was substantial. Of these 19 states, 11 said that only updates needed to be reviewed in the off years and these updates are much shorter than completing (or processing) a new application. Four other states said that eliminating the need to review detailed project descriptions each year was instrumental in lessening the paperwork burden. A few of these states said the amount of paperwork reduction was "very substantial."

Some of these "successful" states had such dramatically different stories to tell than the "unsuccessful" states that it was difficult to believe that they were both talking about the same thing. The data suggest that there is considerable variation in the ways states have implemented the three-year cycle. The answers to several of the interview questions suggest that the successful states may be using different kinds of update materials than the others.

These 33 states using annual updates were asked whether they had problems in updating. Problems were reported by 14 states. However, the states unsuccessful in reducing their paperwork were more likely to report problems as shown in Table 2.

Table 2

Problems with Annual Updates as a Function of Paperwork Reduction[a]

SEA Paperwork reduction	Problems with Annual Updates	
	No	Yes
No	4	7
Yes	14	5

---

[a] Data from three states using the three-year cycle are missing.

Six of those seven unsuccessful states that had problems with updates said that the SEA has to keep referring to the original three-year application in processing the update. In other words, successful and unsuccessful states appear to differ in how they handled the updating process. The successful states seemed to have found a way to process a shorter form efficiently. In contrast, the unsuccessful states have not implemented a procedure that permits them to capitalize on the potential advantages the three-year cycle offers. One of these coordinators, for example, commented that he often did not know which items in the update were different from the original application, and, in effect, had to review both the update and the original application jointly. On the other hand, the states that have reduced their paperwork seem to have developed procedures that circumvent this problem; they never mention having to go back to the original application when processing the update.

The foregoing discussion implies that making the three-year cycle work is a nontrivial matter. By allowing states to use a three-year cycle, Congress only gave states an opportunity to reduce paperwork: It does not happen automatically. To make the three-year cycle work, a state may have to design new management procedures that capitalize on this opportunity. Since the staffing and funding resources available to the successful and unsuccessful states did not differ, this raises the question: What is different about successful states that allows them to adapt to the change? The data from this study suggest that the management styles of the successful states may differ from that of other states. It may be this style permitted these states to adapt to the change more readily than others. Responses to the interview questions, as well as a look at the application materials, provide some evidence in support of this conjecture. These findings are discussed below.

Percent of Time Spent on Application Approval

State Title I coordinators were asked what percentage of their time (and time of their staffs) was spent in approving district applications. It was hypothesized that states reporting that the three-year cycle reduced paperwork for them and their districts might tend to spend a smaller percentage of time on this responsibility than other states. Table 3 presents the percentage of time spent on application approval as a function of use of the three-year cycle.

Table 3

Percent of Time Spent on Application Approval as a Function of Three-year Cycle Use[a]

Three-year Cycle Use	Median Percent of Time Spent	Low	High	N
No	22.5	10.0	41.0	16
Yes, No Paperwork Reduction	20.0	5.0	37.0	11
Yes, Paperwork Reduction	15.0	10.0	44.0	19

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[a] Data are not included for the three states that reported that only the paperwork of their districts was reduced.

Since the successful and unsuccessful states did not differ in terms of their state characteristics, the lesser percentage of time spent on application approval does not reflect fewer applications to process or greater numbers of staff available to process the applications. Thus, these data offer support for the hypothesis that the successful states may have developed more effective strategies for implementing the three-year cycle. These more effective strategies, then, may have led to a reduction in paperwork and to less time spent on the application approval process.

Desire for Standard Application Approval Formats

State Title I coordinators were asked whether they felt the application approval process would be facilitated by having standard formats or model materials. Thirty states said it would not be helpful, eleven said it might be helpful, and only eight said it would be helpful. Cross-classifying these responses with use of the three-year cycle as shown in Table 4 shows an interesting relationship.

Table 4

Desire for Standard Formats as a Function of Three-year Cycle Use[a]

Three-year Cycle Use	Desire for Standard Formats		
	No	Maybe	Yes
No	10	1	5
Yes, No Paperwork Reduction	5	4	2
Yes, Paperwork Reduction	14	4	1

---

[a] Data are not included for the three states that reported that only the paperwork of their districts was reduced.

In this table, the cross-classified responses in the last two columns are of special interest. Superficially, one might think that responses of "maybe" and "yes" to the "standard formats" question reflect similar viewpoints, but, in reality, this is not so. The comments made by state coordinators to this question reveal strong differences in point of view.

States that would like standard formats actually take a rather passive stance: The dominant reason is that they want guidance. Illustrative comments are, "This would tell us what the feds want," and "They should provide us with this; it would have eliminated some horrendous discussions." Comments by these state coordinators did not portray the state as an active evaluator; they depicted the providers of the standard forms as the decisionmakers.

In contrast, states that said "maybe" were actually the most active of the three categories of states. The crucial difference is that these states said that they would determine for themselves whether some (or all) of a standard form would be useful. That is, they could not tell whether standard forms might be helpful until they saw such a form and evaluated it. If such forms were provided, they might, say, incorporate some features of the forms into their own. This more active stance, in which the state is viewed as a dominant decisionmaker, is correlated with the decision to adopt the three-year cycle.

The comments made by the 14 coordinators that felt that the cycle reduced their paperwork suggested, in effect, that they have a procedure already in place that works for them, and that there is no reason for their staff to need a new form. As with the "maybe" category, these states appeared to be taking a more active, problem-solving stance. Ten of the state coordinators who responded "no" said that they ought to be responsible for developing their own models, standards, and guidelines; and eight of these ten use the three-year cycle.

These responses are especially interesting in that they provide some insight into the "management style" of the states. Most states did not want standard models or formats, because they felt it was their responsibility to develop their own (10 states) or that there is too much variation across states (e.g., urban-rural) for standard formats to be helpful (10 states). It is significant that the few states that valued guidance from outside also differ on other variables.

With respect to state demographics, three variables differentiated the groups: percent of educational funds from state sources, percent of educational funds from local sources, and population density. As is consistent with the results presented above, the states saying "yes" were most unlike the states saying "maybe," with the states saying "no" occupying an intermediate position between the two. The states that said they might be able to use standard formats are characterized by a high percentage of local funds, a low percentage of state funds, and had high population density. States that would like models had the reverse configuration of funding percentages (high state-low local) and had less population density. The "no" group occupied a middle position on this continuum.

The Three-year Cycle: Further Support for an Active Management Style

Because the successful users of the three-year cycle are characterized as having an active, problem-solving management style, the hypothesis was advanced that this same management style might also appear in their other Title I management responsibilities.

Further evidence that states that successfully used the three-year cycle differ in management style from those that do not is found in the ways they provide technical assistance to LEAS, in the ways they conduct parent involvement activities, and in the extent to which they exercised their rulemaking authority.

Use of statewide conferences to provide technical assistance is inversely related to successful use of the three-year cycle. This relationship is displayed in Table 5. States that successfully used the three-year cycle are less likely to use statewide conferences, while states that did not attempt to use the three-year cycle at all are much more likely to report use of statewide conferences. The data shown in Table 5 are consistent with the findings reported in the chapters on State Rulemaking and Technical Assistance--namely, that the more "active" states tend to rely more on personalized "face-to-face" modes of providing assistance and less on the less personalized service delivery mechanisms.

Table 5

Reports of Statewide Technical Assistance Conferences as a Function of Three-year Cycle Use[a]

Three-year Cycle Use	Statewide Conferences Reported	
	No	Yes
No	5	11
Yes, No Paperwork Reduction	5	6
Yes, Paperwork Reduction	12	7

---

[a] Data are not included for the three states that reported that only the paperwork of their districts was reduced.

The greater involvement of the states reporting satisfaction with the three-year cycle in these face-to-face workshop settings is exemplified in the area of parent involvement. As shown in Table 6, states reporting successful use of the three-year cycle are more likely to work with LEAs, conduct workshops for LEAs on parent involvement issues, develop and disseminate parent involvement materials to LEAs, and work directly with a state Parent Advisory Council (often consisting of district representatives).

Table 6

Type of State-Level Parent Involvement Activities as a Function of Three-Year Cycle Use

Three-year Cycle Use	Work With LEAs No	Work With LEAs Yes	Conduct Workshops No	Conduct Workshops Yes	Develop/ Disseminate Information No	Develop/ Disseminate Information Yes	Work with State PAC No	Work with State PAC Yes
No	6	10	8	8	11	5	8	2
Yes, No Paperwork Reduction	7	4	6	5	10	1	6	4
Yes, Paperwork Reduction	8	11	3	16	8	11	5	7

As might be expected from these data, the successful users of the three-year cycle were also more active when the total number of their state-level parent involvement activities were examined (range = 0 to 4). This relationship is presented in Table 7.

Table 7

Number of State-level Parent Involvement Activities as a Function of Three-year Cycle Use[a]

Three-year Cycle Use	State-level Parent Involvement Activities 0 - 1	State-level Parent Involvement Activities 2 or more
No	8	8
Yes, No Paperwork Reduction	7	4
Yes, Paperwork Reduction	4	15

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[a] Data are not included for the three states that reported that only the paperwork of their districts was reduced.

This pattern of findings is consistent with the thesis that successful users of the three year cycle are more active than unsuccessful users in terms of the delivery of support services to LEAs. They are clearly much more active in the delivery of more personalized services to LEAs. In view of the fact that these groups do not differ on the amount of resources available to them (e.g., setaside funds) or number of LEAs to be served, differences between the successful and unsuccessful three-year cycle users cannot be explained by any such outside variables. Instead, the data suggest that the successful states are simply more active and creative managers, and this difference manifests itself in several different areas. One difference was discussed in the previous chapter on Rulemaking. Here, the active problem-solving stance of the successful users was noted when it was observed that successful cycle users also tended to use their rulemaking authority, actively, while the unsuccessful cycle users did not.

Use of Three-year Cycle and Development of Exemplary Practices

The Title I coordinators were asked whether they had developed any successful practices or materials in the area of application approval with which they were particularly pleased and that could be shared with other states. Thirty states reported that they had developed exemplary practices or materials in the area of application approval. Of these, 22 states said they had developed exemplary materials, and 10 states said that they had developed exemplary processes. The most frequent kinds of materials mentioned were the application itself (9 states), the instructions for the application (7 states), and an application review instrument or checklist (7 states). The most frequently reported process was the development of a management system (5 states). Other exemplary processes mentioned were the use of a computerized processing system, the inclusion of LEAs in the review process, and the use of more than one reviewer for each application. One particularly interesting process included reviews by an advisory committee, which included local administrators, teachers, and parents.

The development of exemplary practices is correlated with success in using the three-year cycle to reduce paperwork. This relationship is displayed in Table 8.

Table 8

Exemplary Application Approval Practices as a Function of Three-year Cycle Use[a]

Three-year Cycle Use	Presence of Exemplary Practices	
	No	Yes
No	6	9
Yes, no Paperwork Reduction	4	6
Yes, Paperwork Reduction	2	14

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[a] Data are not included for the three states that reported that only the paperwork of their districts was reduced.

Although most states reported having developed exemplary materials or practices, this trend was more pronounced in the states that reported that their paperwork was reduced by using the three-year cycle. These states may have felt that it was their responsibilty to develop materials and procedures, and clearly a higher proportion of them did so. The same relationship was observed above with use of the three-year cycle and desire for standard formats.

The development of exemplary materials was predicted by the configuration of percentage state and percentage local funds. States that had developed exemplary practices were characterized by the high percentage local-low percentage state configuration, while states that did not develop exemplary materials showed the opposite configuration (high state-low local). This is the same pattern that differentiated states that wanted standard formats from those that did not, but it is not true that the development of exemplary materials is related to attitudes toward standard formats.

Use of the Three-year Cycle and an Examination of the Application Form

The discussion so far has argued that the successful users of the three-year cycle may have a more active, and perhaps more effective, management style than the non-satisfied users. This management style has permitted them to adapt successfully to use of the three-year cycle. While this point of view is supported by states' responses that indicate that states are using different kinds of update forms (e.g., one state said that the update is the same as the application except for the title page, while some successful states said that the update is only a few pages or a small fraction of the length of the application), further possibilities exist. One is that the states are serving different kinds of LEAs; it may be easier to make the update simple if almost all of the districts are small and the relationship between the SEA and LEA is close. Another point of view is that paperwork is reduced by not doing a thorough job; that is, the states that say that the law doesn't permit a "real" three-year cycle may be right. To be thorough and complete may be inconsistent with the goal of paperwork reduction.

To examine these alternatives, it was important to review the applications and updates from all of the states. Each application was reviewed to determine the degree to which it requested information about district legal requirements. From an examination of the legal district requirements in Subpart 3 of P.L. 95-561, 21 requirements were selected for examination. While this list is not exhaustive, these points were selected because they described specific actions to be taken, they were commonly represented in district applications, and they were easily identifiable. A list of the 21 points is included in Table 9. While the Title I law did not require that each of these points be represented in the application, states had the responsibility to ensure that these relevant provisions were met. It was not unlikely that states would use the application as a vehicle for collecting the information on these points to facilitate making their necessary determinations. An example of a legal requirement that may not be included in great detail on the application is comparability, since districts are required to submit comparability reports to the state at regularly scheduled times.

Table 9

Legal District Requirements Reviewed in State Applications

Funds Allocation

- Maintenance of effort (Section 126(a))
- Excess costs (Section 126(b))
- Comparability (Section 126(e))

Targeting and Student Selection

- Using low-income measures for identifying school attendance areas (Section 111(a))
- Serving high-ranked eligible schools (Section 122(a))
- Serving students in greatest need first (Section 123(a), 124(b))
- Private school participation (Section 130)

Table 9 (continued)

Program Design

- Program description (Section 121, 124(b)(2))
- Design to meet the special needs of educationally deprived students (Section 124(a))
- Determine childrens' needs for program design (Section 124(b))
- Coordination with other programs (Section 124(f))
- Teacher and school board participation (Section 124(i))
- Training aides with teachers (Section 124(l))
- Written complaint resolution procedures (Section 128))

Evaluation

- Evaluation of effectiveness in meeting special needs (Section 124(g))
- Measure of sustained effects (Section 124(g))
- Use of evaluation for program improvement (Section 124(g)(3))

Parent Involvement

- Parent participation (Section 124(j))
- District advisory council (Section 125(a))
- School advisory council (Section 125(a))
- Advisory council responsibilities (Section 125(b))

Because it was known that states might collect information on these 21 points using contractual documents other than the application, caution was exercised in setting up the rating procedures. AIR staff did not want to downgrade states for failure to collect a sufficient amount of information on a particular requirement, since states may have used other methods or documents for collecting the information that were not provided to the study staff. AIR staff, however, finally decided to use the rating system simply to assess the extent to which the applications were used to collect information on these points. Thus, the observation that a requirement is missing from an application should not be overinterpreted to mean that a state is negligent in its application approval responsibility.

Each requirement received a rating of "absent," "insufficient," or "sufficient," depending upon the amount of information states requested on the application forms, updates, or instructions. The amount of information that states needed to be able to make the determination that districts were, in fact, in compliance was defined to be "sufficient." An assurance or a lesser amount of information provided was defined to be "insufficient." A requirement was "absent" if no information was collected on the application. [For a complete discussion of how each requirement was reviewed and for examples of "sufficient" ratings taken from existing state documents, see the management module on application approval produced as part of the State Management Practices Study (Putman, 1982).] States were then categorized by their overall scores as being in one of five categories:

- the application was primarily "absent" considering the 21 points,
- the application was primarily "insufficient" considering the 21 points,
- the application was primarily "sufficient" considering the 21 points,
- the application had equal numbers of the three ratings, or
- the application had equal numbers of the "insufficient" and "sufficient" ratings.

The correlations between states' classifications on the application and state demographic variables were low; however, the direction was consistent. The number of "absent" ratings (no information requested) correlated negatively with population and financial variables, such as 1980 population, number of SMSAs larger than 25,000, number of SMSAs greater than 100,000, state administration funds, and total revenues. These correlations averaged about -.25. The number of "sufficient" ratings was positively related to these variables, but the relationship was even weaker; the average correlation was about .15. The number of "insufficient" ratings did not correlate with this set of demographic variables.

The cross classification of state ratings by use of the three-year cycle is shown in Table 10.

Table 10

States' Application Ratings as a Function of Three-year Cycle Use[a]

Three-year Cycle Use	Application Ratings: Primarily Absent	Primarily Insufficient	Primarily Sufficient	Equal	Insufficient/ Sufficient
None	1	4	5	2	4
Yes, No Paper-work Reduction	0	3	5	1	2
Yes, Paper-work Reduction	3	1	9	0	4

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[a] Data from five states are missing.

The relationship between these variables and success in using the three-year cycle is not clear cut. When the states are grouped according to no use, use with no paperwork reduction, or use with paperwork reduction, no difference in the number of "absent" and "sufficient" ratings were found. However, states that reduced paperwork using the three-year cycle had significantly fewer "insufficient" ratings than those that did not attempt the three year-cycle. The "non-use" group averaged 8.75 insufficient ratings, while the successful states averaged 6.8 insufficient ratings. The states that tried the three-year cycle but did not realize a reduction in paperwork averaged 8 insufficient ratings, which was not significantly different from either of the other two groups.

This set of results suggests that the successful states are doing as thorough a job as the other states as far as collecting sufficient amounts of information on the application. The successful states are doing a quite thorough job, as they account for a large proportion of the primarily sufficient ratings. However, the ratings did not differentiate updates from original applications, so it is difficult to determine other ways in which the applications of states successful in reducing their paperwork differed from those of states unsuccessful in reducing their paperwork. As we discussed above, the crucial difference may be in the way successful and unsuccessful states handled the annual updates. Since the successful and unsuccessful states did not differ in the frequency with which they made changes to these updates, the content of the updates, or perhaps their formats, may be important differentiating factors.

Three-year Cycle Use and SEA-ED Relationships

Because successful use of the three-year cycle might have been enhanced by a positive relationship with the U.S. Department of Education staff, state Title I coordinators were asked how the federal Department of Education helped them to carry out their application approval responsibility. Five said that they felt ED had hindered their efforts, seven found ED "somewhat" helpful, twenty-three said ED was helpful, and the others expressed a neutral relationship or indicated that they did not consult with ED on application approval issues. Of those that found ED not helpful, many expressed difficulty in obtaining answers to their queries (e.g., clarification of the law). Other states, however, reported that ED was helpful and responsive to exactly the same type of query. As part of their response, many states commented that they functioned relatively independently of ED; they qualified their answers by saying that their contact was minimal anyway.

There is a relationship between helpfulness of ED and use of the three-year cycle as shown in Table 11.

Table 11

Helpfulness of ED as a Function of Three-year Cycle Use[a]

	ED Helpfulness			
Three-year Cycle Use	Hindered	Somewhat Helpful	Helpful	Neither/ Not Consulted
No	3	4	5	2
Yes, No Paperwork reduction	1	1	4	4
Yes, Paperwork Reduction	1	2	13	1

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[a] Data from eight states are missing.

As shown in Table 11, states using the three-year cycle are more likely to find ED helpful than those that are not. In addition, almost all states that felt the three-year cycle reduced their paperwork and that of their districts found ED helpful.

It appears from the comments made during the interviews that states not on the three-year cycle had difficulties communicating with ED. Their problems typically dealt with getting clarification of the law or checking the legality of practices with ED; their complaints were that the responses were slow (i.e., in writing) or insufficient. States on the three-year cycle apparently enjoyed greater success in communicating with ED on the same kinds of issues.

Summary

Taken together, these findings seem to suggest the following: Although use of the three-year cycle is widespread, an appreciable proportion of these states feel that it has failed to accomplish its primary purpose and may even have created additional paperwork (e.g., by having to review both the update and original application). The three-year cycle only provides an opportunity to reduce paperwork; accomplishing this objective is nontrivial. There is substantial variation in how states implemented the three-year cycle, particularly how they handled the problem of annual updates. Some states say that use of the cycle has reduced the paperwork for them and their districts more successfully than others. States that feel that they should take an active role in planning and structuring their programs are more likely to be on the three-year cycle, and states that would like to have guidance from outside in structuring their application forms are more likely never to have attempted it. States that reported that their paperwork had been reduced through use of the three-year cycle were more likely to have developed exemplary practices and to have enjoyed a more positive relationship with ED. It may be that an active, problem-solving stance is necessary to make the three-year cycle work, since several of the coordinators who said that the paperwork reduction was substantial were also especially clear in saying that standard formats would be of no value to them (i.e., forms should be tailored to meet each state's own needs; they say they already have in place a system that works).

Application Approval Changes Unrelated to Use of the Three-year Cycle

States were asked to describe how they changed their practices in response to the 1978 Title I law. Changes to the content of the application forms, changes to the format of the forms, changes to the updates (or annual form), and changes to the application approval process itself were common responses to this question.

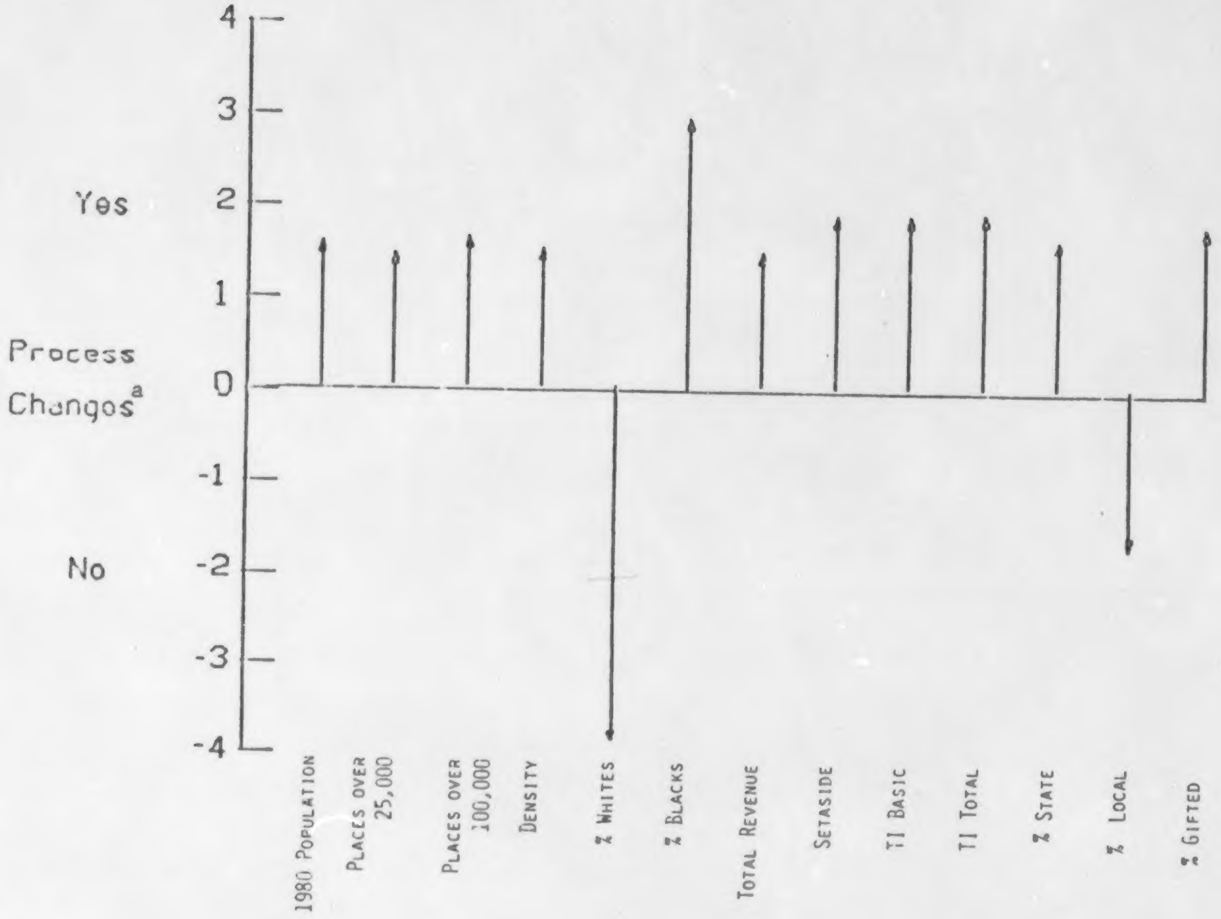
Thirty-eight states reported that they had made changes to the content of their application forms. Nine added new sections to meet the requirements of the 1978 law; and ten specifically mentioned changing or adding sections in the area of parent involvement and parent advisory councils.

Twenty-nine states reported changes to the format of their forms. The tendency was for these changes to be in the direction of simplifying or shortening the forms. Four states said they now use checklists, and seven said they did something to simplify the form. While several coordinators mentioned shortening the application form to reduce paperwork, especially for their districts, this variable did not correlate with any of the variables mentioned in the previous section on paperwork reduction.

Twenty-nine states said that they changed the process by which they reviewed applications. The types of changes mentioned were more diverse than those from the previous questions. Changes in the number of staff used (both increases and decreases) were mentioned, as well as more or less use of regional staff in the review process. Other areas of change were in the areas of use of computers and word processors to keep track of information. Curiously, this variable was related to several demographic variables pertaining to the "size" of the state in the sense of population and finances.

Figure 1 shows the pattern of mean differences on several important demographic variables for states that reported changes to their application approval materials or processes as no changes. Because these variables are measured on different scales, they have been reexpressed to make the differences between the two groups easier to see. For each variable, the mean difference between the "change" and "no change" groups is graphed. If states that made changes have a higher mean than states that did not, the arrow points upward. Conversely, if the states that did not make changes have the higher mean, the arrow points downward. Each unit on the Y axis corresponds to one standard error. Thus, an arrow two units in length represents a statistically significant difference between the groups.

Because the types of changes made by these states are so diverse, it is surprising that any relationships exist. Although several of these variables showed significant differences, a single test of the significance of the entire group of variables showed that this set actually does *not* predict whether a state made process changes (F=1.21, p = .31). Thus, it may be that the results depicted in Figure 1 may be falsely conclusive. This is plausible, both from a substantive and statistical viewpoint. Since the types of changes mentioned by the states are so diverse, it is difficult to imagine a single mechanism that could account for the pattern of differences shown. Also, the intercorrelations among these measures are extremely high (correlations between population and financial variables are in the .90's). Figure 1 seems to imply that there are several *independent* dimensions on which the groups differ, but the intercorrelations show that this is misleading. Very clearly, each variable is not contributing independent information. The single overall test, in effect, says that the information in this set of variables is not sufficient to differentiate the groups.



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[a] An arrow two units in length represents a statistically significant difference between the two groups.

Figure 1. Profile of demographic differences--process changes.

Interrelationship with Other State Responsibilities

One of the intentions of Congress was that the application process would be a cornerstone for other Title I responsibilities, such as monitoring, auditing, evaluating programs, and providing technical assistance. To help states do this, Congress required that, prior to approval of an application, states were to review

- the results of federal and state audits,
- the results of federal and state monitoring reports,
- administrative complaints made by parents or other individuals concerning the district, and
- districts' evaluation reports.

The data collected during the interviews show that, for the most part, coordinators used problems encountered during the application approval process to focus their monitoring and technical assistance efforts for the particular LEAs experiencing difficulties. If the same problems kept emerging time after time, the coordinators would generally try to hold regional workshops to discuss the requirements, disseminate written information about the requirements, or take such steps as were needed to correct the problems.

Problems with particular LEA requirements were not generally passed along to auditors, since the coordinators felt strongly that this would violate the "independence" of the auditors. In cases of a few recalcitrant districts or in cases where the coordinators were in more frequent communication with their auditors, problematic information on requirements or districts was shared.

Most coordinators reported that they took the results of federal program reviews into consideration prior to approving applications. For those coordinators who had experienced complaints, all but four indicated that the complaints were resolved or on their way to resolution prior to approval. In the four cases where the coordinators indicated the complaints were not resolved prior to approval, most of these complaints were felt to be irrelevant to Title I matters or holdovers from the pre-1978 era.

Less agreement was observed on taking LEA audits and evaluation reports into consideration prior to approval. Eight coordinators indicated they did not either review audit findings or hold up the application approval for a review of audit findings unless an audit exception was noted. In one case, the coordinator indicated he has never seen the audit findings from any of his districts--even when exceptions occurred. In another case, summaries of audit findings which were paid for and prepared by auditors hired by local districts, were sent to the state audit agency; this agency never shared the information with the Title I unit.

Evaluation reports were not used by eight coordinators in the application approval process due to a variety of reasons--the primary one being the lateness of obtaining the information. In several of these cases, however, the evaluation results from the year previous to the last school year (i.e., data that were two years old) were considered in the application approval process. Several coordinators, however, were very active in taking the districts' evaluation results into consideration prior to approval. If the evaluation data showed low achievement gains for one or more buildings or for the district as a whole, the local school district was required to indicate on its application how it planned to modify its program in light of these findings. In one case, state and local Title I staff sat down together to identify factors that could possibly have accounted for the low gains and to work out modifications to the program that might improve it.

Problems

State Title I coordinators were asked to what extent the application approval provision created problems for them. The context of this question was such that state coordinators focused on problems other than paperwork, which had been covered elsewhere in the interview. Twenty-one states reported that they had problems. The most frequent types of problems concerned lack of enough time to process applications (5 states), problems with having LEAs complete applications (7 states), and problems with the language of the law (5 states).

Almost all of the coordinators (N = 44), however, reported that one or more of the district requirements were problematic in the approval process. Many of these coordinators indicated that the problems were major enough that they were forced to delay approval of the application until the applications were changed to bring the districts into compliance. Table 12 presents the number of problems reported for each district requirement and the number of times states reported delaying or withholding approval of the application.

Table 12

Reports of Application Approval Problems and Incidences of Withholding of Approval by District Requirement

Type of Problem	Number of Problems	Number Delaying or Withholding Approval
Funds Allocation		
• Maintenance of effort	16[a]	11
• Excess costs	12[a,b]	5
• Supplement not supplant	18[a,b]	10
• Comparability	19[a,b]	7
Targeting and Eligibility		
• Designating school attendance areas	20[a,b]	10
• Children to be served	10[a,b]	4
• Private school participation	17[a]	10
• Schoolwide projects	2	1
Program Design		
• Purpose of program	1	2
• Assessment of educational need	12[a,b]	10
• Planning	1	2
• Sufficient size, scope, & quality	11[a]	6
• Expenditures related to ranking of project areas and schools	15[a]	8
• Coordination with other programs	7[a]	2
• Information dissemination	3	1
• Teacher & school board participation	8[a]	3
• Training of education aides	6	3
• Control of funds	1	1

Table 12 (continued)

• Construction	3	2
• Jointly operated programs	2	1
• Accountability	2[a,b]	1
• Complaint resolution	3	1
• Individualized plans	3[a]	1
• Noninstructional duties	8[a]	1
Evaluation		
• Evaluation	10[a,b]	4
• Sustaining gains	8	4
Parent Involvement		
• Parent participation	8[a,b]	3
• Parent Advisory Councils	18[a,b]	9

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[a] These items were mentioned as being a "major" problem by at least one state Title I coordinator.

[b] These items were mentioned as being a "major" problem by at least one-half of the state Title I coordinators who reported it as a problem.

As evident from the table, the funds allocation and targeting and eligibility provisions caused problems for the coordinators, and approval of the application was often delayed until these problems were corrected. Of the other provisions, needs assessment, expenditures related to ranking of project areas and schools, and the parent involvement provisions were felt to be major problems and ones for which approval of the application was often withheld. The insufficient size, scope, and quality provision occasioned many sarcastic comments by coordinators, who said they were not sure what the provision meant in the first place, and they were even less sure what they needed from the districts to ensure that this provision was met.

Many of the problems with the district requirements may have been caused, in part, by the language of Section 164, which says that state agencies "shall approve an application...if such...agency is satisfied [emphasis added]...that such applicant agency will use the funds received...in a manner which meets the requirements of this title." Several state Title I coordinators were unsure how much information they needed to collect from local districts before they would be satisfied that their districts were in compliance. This uncertainty of how to interpret the "satisfied" clause coupled with the uncertainties of how to interpret some of the program design requirements created much frustration for some coordinators.

All of the coordinators took the application approval process seriously: In fact, only five coordinators rated the provision as of "moderate" importance in meeting the purposes of the law (and no one rated it as having "no" importance). Because of the importance of the provision and, perhaps, because of the legally binding nature of the application, coordinators appeared to resent the vagueness of the law and the lack of help from the Department of Education, as both factors made their job more difficult. For example, delays in receiving waivers from ED of maintenance-of-effort for their districts or failure to require the "right" kind of information from LEAs so that they could adequately address the sufficient size, scope, and quality provision could lead to serious problems for the coordinators in terms of audit exceptions or citations from the federal program monitoring reviews.

Because of the short timelines under which they had to approve the applications, states were concerned that they were not able to do as thorough a job as they would have liked. The notion of an application having "substantially approvable" status was one way that states could buy more time for processing the applications. Thus, for those sections of the application that were approved, districts could receive a portion of their funds and begin their programs on schedule, while negotiations continued on the remaining items to bring them into compliance. For these states, the concept of "withholding" approval was totally foreign. Their attitude was that all applications would be approved eventually, but some may need a little more help and negotiation than others before final approval could be given.

An issue of concern to quite a few coordinators was the fact that districts were to complete their applications. Two types of problems with districts were noted. First, personnel were not perceived by their state staff to be sophisticated enough to be able to complete the application directly. Consequently, state Title I staff often went to the districts to help them write their project narratives and to provide them with feedback on the submission prior to its official submission. Second, some district personnel were so extremely sophisticated in grant writing that they could "make even a lousy project sound exemplary." Thus, even though the printed words were in compliance, the state office was not really sure the words accurately reflected project activities until the monitoring visit was conducted.

Avoidance of problems led, in some cases, to the creation of several exemplary application review processes. Because some coordinators felt district personnel could improve their own submissions by seeing the problems encountered during the review process, they included a few district coordinators as outside reviewers. Other coordinators instituted advisory panels, containing parents in addition to state and local administrators, for reviewing the applications. Not only did these processes cut down on the amount of time spent in application approval, but they also facilitate state-local-parent relationships.

Another approach to avoiding problems taken by some coordinators was the assignment of multiple state reviewers to each application. The reason given was that several reviewers would be less likely to miss something on the application than if only one reviewer had complete responsibility.

Other coordinators wanted to minimize the possibility that personal relationships of state reviewers with their districts might result in certain noncompliant items being "overlooked." Thus, they rotated the application reviewers frequently, and they made the application reviewers monitor different districts to prevent this problem from occurring.

Having problems with the application approval process was noteworthy in that it did not correlate with a single other demographic or interview variable. Thus, apart from itentifying the specific problems mentioned by the states, it is difficult to say very much more about these states.

Continuation

At the end of the application approval section of the interview, states were asked whether they would include applications in their program management if there were no or minimal legal requirements for them to do so. Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As part of the interviews conducted onsite to a representative sample of 20 states, state-level personnel were queried specifically about their continuation plans under Chapter 1. By this time, the Chapter 1 requirements were a little better understood, and state coordinators were beginning to make plans as to what aspects of their Title I practices would or would not be included as part of Chapter 1 management.

The discussion on continuation plans is presented in two parts. The speculative answers provided by the 49 Title I coordinators during the telephone interviews will be summarized and interpreted first. The information obtained from the 20 state Title I coordinators in response to specific probes about their Chapter 1 application approval plans will be presented next.

Application Approval Plans: A Speculation

The answers of the coordinators to the theoretical question, whether they would continue to include application approval if it were not expressly required by law, or summarized in Table 13.

Table 13

Application Approval Continuation Plans

Plan	Number of States	
• Don't know	2	
• Not continue	1	
• Continuation (plans unspecified)	3	
• Similar to current practice	24	
- Request the same amount of information as is currently being requested		19
- Request more than assurances		4
- Request information on targeting		8
- Request information to ensure supplemental nature of program		7
- Request fiscal information		7
- Request information on program design		7
- Request information on needs assessment		7
- Request information on evaluation plans		4
- Require maintanance of effort		1
• Modified practices	15	
- Rely more on assurances		7
- Relax rules to add more flexibility		6
- Include nonpoverty children		2
- Balance accountability and paperwork		1
• Different practices	4	
- Delete comparability		2
- Delete PACs		2
- Delete all parent involvement		1
- Delete maintenance of effort		1
- Include LEAs in decision process		3
- No application per se--only a list of assurances		1
- Make general aid		1

From the table it is apparent that all but three coordinators definitely would plan to continue application approval. Continuation for 24 of the states is expected to take the same form as at present, while 19 indicated they would change some feature of their current practice.

The two coordinators who indicated that they were uncertain of their continuation plans also indicated that whatever continuation plans were made would depend upon the wishes of their Chief State School Officers on other state-level policymakers. Curiously, these two coordinators also reported no use of the three-year cycle and spending two of the highest percentages of staff time on the application approval process.

The four states that would change their current practices, in general, favored involving LEAs more directly. With respect to state demographics, these states differed from the remaining two groups in the configuration of percent state and percent local funds. The states that would do application approval differently had significantly lower percentage state funds than each of the other two groups and a significantly higher percentage local funds than the two remaining groups.

States' continuation plans as a function of some of the variables discussed in this chapter are summarized in Table 14. While the presence of problems may tend to be associated with changes to current practices, these states were still active in the area of application approval--they tended to develop exemplary practices, they made annual changes to their application forms, and those that used the three-year cycle tended to be satisfied with it. States planning to do similar practices tended to use the three-year cycle, and many were satisfied with it; they enjoyed a supportive relationship with ED; they developed exemplary practices.

Table 14

Application Approval Continuation Plans: Comparison of States

Variable	Continuation Plan Not Continue/ Don't Know	 Yes/ Similar	 Modified	 Different
• Three-year cycle use				
- No	2	8	5	1
- Yes, no reduction	1	7	2	1
- Yes, reduction	0	11	6	2
• Annual changes to application form				
- No	1	14	6	3
- Yes	2	12	9	1
• Presence of application approval problems				
- No	3	16	8	1
- Yes	0	10	7	3
• Presence of exemplary application approval practices				
- No	1	7	4	2
-Yes	2	17	7	2
• Desire for standard formats				
- No	1	15	11	3
- Yes	0	9	1	1
- Maybe	2	3	3	0
• ED helpfulness				
- Hindered	0	2	3	9
- Somewhat helpful	0	3	2	2
- Helpful	2	14	6	1
- Neither/Not consulted	1	6	4	1

It had been expected that states that expressed satisfaction with the three-year cycle might be more likely to report continuation using similar practices, while the remaining states might want to change. The data, however, do not support this hypothesis.

Application Approval Plans: Preliminary Views of Chapter 1 Impact

During subsequently conducted onsite interviews to a sample of 20 states, the Title I coordinators were probed about their plans for approving applications under Chapter 1. Since application approval is a required activity, the questions probed what changes to their management they might anticipate making, and what problems they might anticipate in carrying out their application approval activities. So that the comments of these coordinators can be placed in perspective, a summary of their past application approval activities is included in Table 15.

Table 15

National Sample of 20 States: Description of Past Application Approval Activities

Variable	Number of States	Variable	Number of States
• Three-year cycle use		• Desire for standard formats	
-None	6	-No	15
-Yes, no reduction	1	-Yes	4
-Yes, reduction	11	-Maybe	1
• Annual changes to application form		• Initial continuation plans[a]	
-No	11	-Similar/Yes	13
Yes	9	-Modified	5
		-Different	2
• Presence of problems		• Presence of exemplary practices	
-No	13	-No	6
-Yes	7	-Yes	12

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[a] Data collected during initial telephone interviews

It is of interest that the sample contains such a high proportion of states that found that the three-year cycle was successful in reducing their paperwork.

While six of the seven states wishing to change their practices said they wanted to rely more on assurances, it is not clear that their wishes came to pass. An examination of several of their Chapter 1 applications showed little changes in the way the information was collected.

Assurances, while certainly easier for states to process, generated much discussion from the coordinators. One point of view was that the states would receive pressure from their districts, or possibly other state decisionmakers, to collect assurances. The other point of view, expressed vehemently by one coordinator, was "I need more than a bunch of checklists. How can I be assured that my locals are really in compliance if all I get are lots of "yeses" and "noes?""

Most states in the sample indicated they wanted to simplify their application forms or the approval process in some way to reduce their paperwork and to make it easier for their districts to complete the application. Other than relying on assurances, shortening the application form to include collection of hard data on only the few items required by law was frequently mentioned. One creative solution, proposed by one Title I coordinator early in the planning process, consisted of staggering the submission times for various portions of the application. In this way, both districts and states (with limited budgets and staff) could spread out the processing and the paperwork more evenly over a longer time period.

Several states in the sample with state compensatory education programs planned to continue a joint application with Chapter 1 and their state compensatory program. Previously the state mandates for their state compensatory education program matched those for Title I, which facilitated a joint application effort. One problem that was expressed by one of these states concerned the fact that the lesser Chapter 1 requirements were now at odds with their state mandates (e.g., parent councils)--a problem that was not resolved at the time of the interview.

In addition to the problems noted above, two other major application approval problems were anticipated. First, extremely active (and generally large) LEAs may apply pressure on states not to include any items not required by law in their applications. Without the perceived enforcement sanctions discussed in the last chapter, coordinators expressed uncertainty in their rights to continue with an application identical in size and detail to the one used for Title I. Second, with fewer staff to approve applications, state coordinators may be forced to consider ways of shortening their applications, through use of assurances for example, even though they do not feel they are valid indications of compliance.

Application Approval: A District Perspective

To obtain some indepth information about the details of the application approval process at the district level, a sample of the districts (N = 62) included in this study were queried about their local activities in this area. All of the 98 districts, however, were asked about key aspects of the process that they liked or did not like.

Of the 62 districts interviewed to ascertain a picture of the local application approval process, 80 percent of them indicated that the person responsible for completing the applications was most often the local Title I coordinator acting alone (N = 29, 46.8 percent) or with input from his or her staff (N = 24, 38.7 percent). The remaining districts reported that their applications were completed by the person in charge of all federal and state programs (N = 6, 9.7 percent) or by some other configuration of personnel (N = 3, 4.8 percent).

All but four of these sixty-two districts indicated that they received assistance from someone at the state level to help them complete their applications. The most likely response was pre-submission conferences. In some cases, state staff would either go to the district to work over the details of the application in a "mini" review prior to submission or appear regionally to help a number of districts both collectively and individually. As indicated earlier in this chapter, some states even admitted actually writing the narratives required in the applications for their districts.

The applications were submitted directly to the central state Title I office, or in a few cases, they were submitted to the regional office first for a preliminary review. In one state, the bulk of the application approval process took place at the regional offices, although the narratives or program content were sent to the relevant content specialists located in the central state office for review.

Forty districts indicated that they had never had approval of their applications delayed for any reason. Eight LEAs reported delays of one month, five LEAs reported delays of two or three months, three LEAs reported delays of from four to six months, and another group of six LEAs reported slight delays but were unsure of how long they were.

A number of districts felt that some of the delays were expected, since they were not experienced in making budgets and, as a result, tended to make "lots of nitty gritty errors" that caused them to resubmit their application a number of times. Others, especially those with only a few years of experience, expected to make mistakes, simply due to lack of experience in completing the forms. Generally, most of the districts interviewed indicated that the delays were not substantial, and that the errors tended to be trivial.

The use of the "substantially approvable" application was probably a help to these districts. The fact that the project was substantially in approvable form meant that funds could be spent for the activities that were approved; thus, the project could most likely begin on time.

In cases where project approval took longer, there tended to be more serious problems that had to be negotiated. In one case, the state and district disagreed as to whether the number of hours an aide spent in the regular classroom disqualified her from being paid for out of Title I funds. In another case, supplement not supplant was at issue.

One coordinator indicated that, as long as he got his money in time to begin Title I programs in the Fall on schedule, he was not concerned how long he had to "haggle over getting his numbers to add up correctly."

Generally speaking, however, districts tended to receive formal approval of their applications within one month after formal submission (N = 34, 65.3 percent), two months (N = 14, 26.9 percent), or three months (N = 4, 7.6 percent).

Twelve districts indicated that they submitted an application annually, while forty-three districts indicated that they submitted an application on a three-year cycle. The districts indicating use of the three-year cycle were queried, as were their states, as to whether use of the three-year cycle reduced paperwork and administrative burdens for them. The cross tabulation of the responses made by states and districts to this question are presented in Table 16.

Table 16

Use of Three-year Application Cycle and Reduction of State and District Burden

	State Three-year Cycle Use			
District Three-year Cycle Use	No	Yes, No Paperwork Reduction	Yes, Paperwork Reduction for Both SEA and LEAs	Yes, but Paperwork Reduction only for LEAs
No	12	0	0	0
Yes, No Paperwork Reduction	1	2	7	3
Yes, Paperwork Reduction	0	2	25	3
Yes, Uncertain Paperwork Reduction	1	0	2	0

Several findings of interest are noted from this table. First, it is apparent that districts tended to agree with their states as to whether a three-year application cycle was used. It seems that the two districts that believed that use of the three-year cycle had not reduced their burden or were not certain whether it had were actually on an annual application cycle, which may account for some of their misperceptions. There is also fairly close agreement between the districts that both reported using the three-year cycle and reported that it had reduced their paperwork and the corresponding beliefs held by their states to this effect. However, in ten cases, the districts felt that the cycle had not reduced their paperwork, although their states felt that it had. A likely explanation for this difference of opinion may be that, since some of these districts were large, they had to complete essentially the bulk of the application every year due to program, staffing, and budget changes. Thus, while the majority of districts, particularly smaller ones, in those states may have been helped by allowing use of the three-year cycle, the large districts may not have seen much relief.

Forty-three districts reported completing annual updates to supplement the three-year application; one did not. Eleven of those that completed updates indicated that they encountered problems in completing them. For five of these districts, the two major problems were the amount of time involved and the perceived annual reporting requirement for large LEAs. A sampling of their comments is:

> The updates are so lengthy.
>
> We have to provide as much information as we did for an annual cycle, since we are a large LEA.
>
> The paperwork reduction is a farce for large districts, since we have to do the same amount of work every year.

For two other districts, the problems were specific to particular LEA requirements (e.g., targeting, selection of schools). The remaining four LEAs reported problems with the application/update itself or the timelines imposed by the state. Some comments made by these coordinators are:

> The update format is too complex. Items are scattered, since we don't have to fill out the form from start to finish.
>
> The indexing system to find your way around the update is so complex.
>
> We have to make out our budgets months before we know the salaries of our teachers. Then we have to make lots of modifications to the application, which take time. The state is really good about allowing us to amend our application, but the whole process gets too lengthy and time consuming.

All 98 districts were queried about what they liked best about the application approval process. Only two districts felt that there was nothing particularly good about the process. Their answers reflected both quality as well as compliance orientations. The responses of the districts can be categorized as shown in Table 17.

Table 17

What LEAs Liked Best about the Application Preparation and Approval Process

Response	Number of Districts
• Positive Feelings about the Application Approval Process	38
- Streamlined and not so time consuming	
- The help given to complete the application prior to submission	
- Likes the 3-year cycle	
- Application does not change much from year to year	
- Application is easier to use	
- LEA can make input into the form before it is made final	
• The Process Leads to Improvements in Program Quality/Better Management	35
- Process forces LEA to plan, including involving regular classroom teachers, Title I teachers, parents, PACs, administrators, and School Board in the process	
- LEA must refocus periodically on its intent and impact	
- Forces LEAs to spell out the program in detail--a good management tool	
• Better SEA/LEA Interactions	14
- Good rapport and working relationship with SEA	
- SEA responsiveness to LEA problems and needs	
- LEA likes the consultants assigned to work with his/her district	
- Creates an advocacy role for SEA	
- LEA likes that the same person who monitors her LEA also approves her application	
- Personal attention is given to LEAs	

Table 17 (continued)

	Number of Districts
• Attainment of Compliance	7
- Keeps LEAs legal	
- Helps prevent auditing and monitoring exceptions	
• The Process Leads to Both Improvements in Program Quality as well as Attainment of Accountability	3
- Analyzing needs and setting priorities helps kids and ensures best use of funds	
• Nothing	2

It is apparent from Table 17 that a large number of the districts believed that the process was important in improving their programs.

Districts were also queried about what they liked least about the application preparation and approval process. Their responses can be categorized as shown in Table 18.

Table 18

What LEAs Liked Least about the Application Preparation and Approval Process

Response	Number of Districts
• Nothing	10
• Process is too Time Consuming/Burdensome/ Involves too much Paperwork	26
• Negative Feelings about the Application Approval Process	30
- Too much uncertainty in completing budgets	
- Too much narrative required	
- Xeroxing so many copies is too expensive	
- Some parts of the application are redundant, not necessary	
- Late forms and too little time to complete them	
- Submission date is too early	
- Timelines do not allow real coordination among staff, since completion takes place over the summer	
• Problems with the SEA	6
- Team assigned to LEA cannot agree on whether or not LEA is in compliance	
- SEA is way of approving anything "futuristic"	
- SEA oversteps bounds when approving items on application	
- SEA gives conflicting answers due to frequent turnover in personnel	
- Lack of communication among regional and central office staff results in approval delays	
• Coordination with PACs	8
- Timelines do not permit meaningful involvement or PAC sign-off	
- PACs aren't geared to provide any help	
• Coordination with Private Schools	5
• Problems with Particular LEA Requirements	4
- Targeting and eligibility	
- Maintenance of effort	
- Some requirements don't fit small programs	

One of the major criticisms LEAs had of their state departments concerned the timelines for preparation of the application. Since most of the LEAs felt the application preparation process was a good planning/management tool, they felt that having to complete it over the summer detracted from this benefit. In fact, when districts were queried about how their SEA could be more helpful to them in the application approval process, a frequent response was modification to the timelines.

Fifty-two districts provided suggestions for how their states could be more helpful to them in the application preparation and approval process. The most frequently mentioned suggestions are summarized in Table 19.

Table 19

Ways in Which SEAs can be More Helpful to LEAs in the Application Preparation and Approval Process

Response	Number of Districts
No suggestions--SEA is doing a good job	18
Simplify the process to include reduction of paper burden	14
Shorten time for approval	6
Provide more assistance to LEAs to complete the application (in person or in writing)	7
Provide allocation information sooner	4
Allow more lead time for preparation	3
Allow more LEA discretion (e.g., use of innovations)	2

Other suggestions, which are quite varied and don't lend themselves well to categorization, include:

- having less staff turnover at the SEA,
- having more competent SEA staff,
- having SEA be more sensitive to the needs of LEAs, and
- having different applications for large and small LEAs.

One district made a particularly unusual suggestion. Being a new local Title I coordinator, she was unsure of what her Title I program looked like in previous years. Her consultant at the state level, who was also new, could not help her in this area. Thus, she suggested that her state Title I office could computerize both its application approval and monitoring processes so that an historical trail of both what worked and what did not work (in terms of monitoring citations) could be kept. That way, she could review the past program and learn from the mistakes/successes made by these earlier managers.

This problem of LEAs not knowing what happened in the past was mentioned by several coordinators in the form of inconsistent comments made to them by the SEA. Some state consultants who apparently were not aware of the past goings on of a particular project might make suggestions for change, which another consultant knew had been tried and found to be unsuccessful or not tried for some other reason. Thus, a much unnecessary "reinventing of the wheel" was perceived to occur by some districts. Better records of project activities at the state level (not at the district level due to frequent changes of staff) were believed by the districts to correct some of these problems.

Districts also recognized that their state offices were often at a disadvantage in not knowing who they (the local Title I coordinators) were due to frequent turnover of staff. Some problems cited earlier with receipt of late forms were not due, as it turned out, to state negligence. In LEAs where the Title I coordinator changed often, states tended to send the application to a designated "contact person," often the local district superintendent or some other district administrator. In one instance, a superintendent unintentionally delayed several weeks before passing the application along to the person who was to complete it. Since the person who was to complete the application had never received any notification in advance as to when the application materials package was to be mailed, this particular individual blamed the SEA for completion of the form in an impossible time period.

Generally, LEAs perceived their state Title I units to be extremely helpful (N = 82, 85.4 percent) to them in preparing their applications. Twelve LEAs (2.5 percent) felt that their states were only slightly helpful to them, and two LEAs (2.1 percent) were neutral.

A sample of 59 LEAs were asked, if there were no requirement in the law for their states to require an application, do you think it would be a good idea for the state to do this? Fifty-five LEAs (93.2 percent) indicated affirmatively; two were unsure (3.4 percent); and only two indicated there was no need for the application. In fact, one of these coordinators strongly resented the fact that Congress and his state office shared the attitude that LEAs needed to complete an application to ensure that the project was legal. He felt many districts would design legal and quality programs without an application.

As the Chapter 1 requirements became better known by LEAs, LEAs were able to speculate about a Chapter 1 application. Districts, as did their states, had mixed reactions to the idea of greater use of assurances.

Some of the district coordinators for whom the preparation exercise was a good management tool indicated that they would feel cheated if they could not go through the process of writing project narratives. Others, for whom the process was primarily to ensure compliance with the law, felt that assurances were sufficient. For other coordinators, such as the ones described above, an application was unnecessary; assurances in this case would definitely relieve the administrative burdens of completing numerous forms.

In summary, states might be able to improve their application approval process under Chapter 1 by being concerned about timelines for the preparation and about how to streamline their forms. Since several LEAs commented on the fragmentation of the form used in a three-year cycle, perhaps clearer instructions or a better indexing system to the various sections in the application might alleviate these problems.

MONITORING

MONITORING

Chapter Highlights

An important indicator of how each state views its relations to districts is the degree to which it uses its monitoring responsibility to help LEAs improve program quality in addition to using monitoring to ensure fidelity to the application and compliance with the law. The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the monitoring (including Monitoring and Enforcement Plan) provisions included in the 1978 Title I law (and the 1981 regulations):

- To what extent did the new monitoring provisions affect states' administrative practices?
- What problems did states encounter in implementing the provisions?
- Did the monitoring provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to monitor if this activity were not expressly required?

While all states said they used monitoring to ensure compliance, only 39 said that program quality was also monitored. Monitoring in compliance-oriented states was, in general, linked more closely with auditing than in the quality-oriented states. Quality-oriented states, on the other hand, generally tied technical assistance to monitoring; they used monitoring visits to identify areas in which technical assistance would be helpful to their districts. Compliance-oriented states are not especially active--even when they monitor for compliance, while quality-oriented states are active.

The study's major findings show that:

- While the compliance-oriented states tended to rely primarily on the application or monitoring checklists as the basis for monitoring, quality-oriented states developed more complex monitoring procedures.
- States focusing on monitoring to improve program quality tended to use content specialists in other units of the state agency or staff located in their regional offices to assist them in the review of program content in the monitoring process.
- During the monitoring process, the quality oriented states tended to visit Title I classrooms, interview teachers and students, and interview parents or Parent Advisory Council members.

The quality-oriented states were also successful users of the three-year cycle, and they tended to make rules to help districts design quality programs--all of which are characteristics of quality Title I administration. Thus, these quality-oriented states were active problem solvers and they tended to go beyond what is required by law to help achieve program quality.

All but three states indicated a desire to continue monitoring if there were no or lesser legal requirements for them to do so. The quality-oriented states planned to continue practices similiar to those conducted at present, while the compliance-oriented states planned to do less monitoring in the future.

Specific continuation plans under Chapter I will be affected by fewer dollar resources and fewer administrative staff. States may not be able to monitor as frequently or as intensely as they have in the past. New ways to monitor more effectively at low cost are sought. "Paper" monitoring is not viewed as a particularly viable option, since states felt they could not make the necessary determinations to assess program compliance. While the threat of monitoring, proposed by some, may be sufficient in the short term to maintain compliance and high program quality, some follow-through is needed to ensure future success and identity of the program.

States with quality-oriented attitudes were viewed by their districts as beng extremely helpful to them, while states with compliance attitudes were felt by their districts to be less helpful. Districts generally tended to be supportive of their states' monitoring efforts; almost all wanted their states to continue to monitor even if they were not required to do so by law.

Introduction

While the Title I statute prior to 1978 did not explicitly specify a monitoring role for state agencies, the importance of monitoring has been recognized by Congress for more than a decade. For example, stronger enforcement of Title I requirements through states' monitoring efforts was advocated in 1969 by the Senate Labor and Public Welfare Committee.

What is striking about the early legislative history on monitoring, as described by Gaffney, Thomas, and Silverstein (1977), is the dual role assigned to monitoring from its outset. That is, monitoring is not a process limited solely to determinations of program legality or compliance to program regulations. Rather, monitoring is also a vehicle by which states can render technical assistance to their applicant agencies, identify exemplary programs, and determine the quality of services provided to the program's beneficiaries. A review of Congressional records and other federal Title I documents led to the conclusion that monitoring for quality of service as well as monitoring for compliance was important. Gaffney and his colleagues summarized this dual role through an identification of three essential components of states' monitoring efforts. Specifically, states were to make determinations of:

- The legality of the programs and projects--Are programs and projects in compliance with the LEA program requirements?
- The fidelity of the Title I program with the project application--Is the LEA's program being implemented according to the design indicated in the application?
- The quality of the services provided to participating children--Do the services being provided appear to be meeting the needs of the children in the program?

Broadly interpreted, monitoring includes a number of activities in addition to formal onsite monitoring visits. For example, reviews of an LEA's application to determine whether Title I projects are designed in line with the designated program requirements is a form of monitoring. In fact, reviews of any reports submitted by an LEA or communications with LEAs can be considered monitoring, because the SEA is both assisting the LEA and at the same time discovering problem areas, which is monitoring. Districts, on the other hand, tend to view the formal visits as the only monitoring activities conducted by states.

Monitoring standards and guidance on monitoring procedures were provided to states prior to 1978 primarily through the GEPA statute and regulations and a handbook and Program Support Package prepared and disseminated by ED (the U.S. Office of Education). Other various ED program directives, guidelines, and memoranda indirectly related to monitoring were also available, but they did not expressly use the term monitoring. The clarity of the legal monitoring framework for state administration of the Title I program as it existed prior to 1978 was examined in depth by NIE (Gaffney, Thomas, & Silverstein, 1977). The NIE study generally noted that the federal legal framework was unclear concerning the proper and efficient monitoring of Title I programs. Specifically, a lack of minimum standards in GEPA or the Title I regulations for states' monitoring efforts and outdated and noncomprehensive federal publications may have led, in part, to the insufficient monitoring instruments prepared by states to satisfy the vague federal requirements noted by the study staff.

The NIE study also observed that states differed widely in how they carried out their administrative responsibilities in the area of monitoring. Some states, for example, conducted monitoring visits to all LEAs on an annual basis, while others visited only their large LEAs annually and the remaining ones less often. Some states required LEA self-assessments, while others did not, nor did they share copies of their SEA monitoring checklists with their districts prior to the visit.

A need for improved state monitoring systems was noted in a report to Congress prepared by the Comptroller General in 1975. The Comptroller General found that about 35 percent of the states visited as part of the study had no formal monitoring systems. The report also suggested that the SEA monitoring visits in the observed states were generally too brief, and the brevity of the visits was felt to undermine an important component of the SEA monitoring function--the process of making judgment as to program quality. The report concluded that the states reviewed needed to establish comprehensive monitoring procedures, formalize existing procedures, or conduct more indepth reviews during monitoring visits if these visits were to be useful in evaluating districts' performance (House Committee on Education and Labor, 1978).

The House Committee on Education and Labor concluded in its report on the Education Amendments of 1978:

> Monitoring is an important part of State administration of Title I. The Office of Education should, in the course of conducting its own program reviews of State administration, insure that such State procedures have been developed and that they are consistent with minimum standards for State educational agency monitoring established by the Commissioner in Title I regulations. (p. 45)

A review of state management practices of Title I from 1965-1976, conducted by SRI International (1979), analyzed the findings of audits and Department of Education (then U.S. Office of Education) program reviews from 1965 to 1976. This study concluded that inadequate scope and frequency of monitoring were consistent problems over the years. While the most recent period (1974-1976) showed an improvement in checks for compliance, problems continued to be observed in the areas of monitoring for program quality and the adequacy of specific program design features.

The recommendations of these various studies, the NIE study on state administration in particular, were influential in contributing to the passage of the 1978 Title I legislation, which contained specific monitoring provisions.

The new legislation expressly provided that each state must "establish standards for monitoring programs, consistent with minimum standards established by the Commissioner, including the frequency of onsite visits and the methods for reporting, responding to and correcting problems uncovered during the monitoring visits" (Committee on Education and Labor, 1978, p. 159).

The 1978 Amendments also included a provision requiring each SEA to submit to the U.S. Commissioner of Education a monitoring and enforcement plan (MEP) once every three years. This plan was to describe a program of regular visits by SEAs to local projects and procedures for verifying information, conducting audits, resolving complaints, and monitoring the compliance of LEAs in providing equitable services to children enrolled in private schools. Along with the submission of the MEPs, states were also required to report on their monitoring and enforcement activities over the previous reporting period. While the extensive specifications provided on monitoring in the 1978 law resulted in an increase in its length, detail, and prescriptive nature, the intent of Congress was to provide SEAs with clearer, more precise guidance to address areas of program need absent from previous legislation, and in many cases to increase flexibility in program management.

The proposed regulations for the operation and administration of Title I programs were published in 1979. The dual compliance-quality role of monitoring was expressly noted in Section 116.151(a), which outlined the scope of monitoring. An SEA shall

(1) determine whether the Title I projects comply with applicable Title I requirements;

(2) determine whether the Title I projects are being implemented in accordance with approved project applications; and

(3) evaluate the quality and effectiveness of the Title I services being provided.

Comments received in response to these proposed rules, however, indicated that some commenters objected to the requirement that SEAs monitor for both compliance and program effectiveness (Section 116.151(a)(3)). Other commenters recommended that the regulations recognize the technical assistance aspect of monitoring, which has historically been an important part of the monitoring for quality process conducted by many states.

The final Title I regulations, which were issued in January 1981, incorporated many of the recommendations made by the commenters. In particular, changes were made to the section noted previously:

- A new item, (a)(4), was added to the purpose and scope of monitoring: An SEA shall provide technical assistance if appropriate (Section 200.151(a)(4)).

- Item (a)(3) was modified slightly to lessen its monitoring for quality thrust: SEAs are to evaluate applicant agencies for their efforts to assess and improve the quality and effectiveness of the Title I services being provided (Section 200.151(a)(3).

The final regulations provided extensive guidance to state agencies for implementing the monitoring provision. Section 200.150 restated the obligation of SEAs to adopt standards for monitoring the effectiveness of their projects in accordance with the MEP. Section 200.151 outlined the purpose and scope of monitoring, specified the frequency of onsite monitoring visits, and specified the issuance of monitoring reports (including responses by the applicant agency to these reports, follow-up on recommendations or corrective actions, and making monitoring reports available to auditors, LEAs, and district advisory councils). Guidance to the states regarding the contents of the MEP was provided in Section 200.21.

The effect of these legislative changes on state administration was twofold. First, the 1978 Title I law required periodic monitoring. Prior to 1978, the federal legal framework required that each state agency "constantly monitor" its districts, and it was not clear whether or not this phrase meant that each LEA had to be monitored on an annual basis (Gaffney, Thomas, & Silverstein, 1977). The regulations allow the largest LEAs (or those with a history of noncompliance) to be monitored at least once every two years, while the remaining districts are to be monitored at least once every three years. This change was to allow states to spread their monitoring efforts over a period of three years, which might help to reduce their administrative burden. Second, specification of increased monitoring activities (e.g., onsite visits, reports, dissemination of reports) meant that some states would have to increase their monitoring efforts substantially in order to meet these new requirements. Because funds for state administration were believed to be insufficient to accommodate these new compliance activities, Congress increased the amounts available for state administration to a maximum of one-and-one-half percent (from one percent).

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the monitoring (including Monitoring and Enforcement Plan) provisions included in the 1978 law (and the 1981 regulations):

- To what extent did the new monitoring provisions affect states' administrative practices?

- What problems did states encounter in implementing the provisions?

- Did the monitoring provisions stimulate states to develop exemplary practices or materials in this area?

- To what extent would states anticipate continuing to monitor if this activity were not expressly required?

Title I projects operated under the 1978 Title I statute and 1981 regulations for only a brief time when, as a result of a change in federal administration and administrative priorities, the Education Consolidation and Improvement Act was passed. ECIA revised Title I, and although the policy is to continue to provide financial assistance to SEAs and LEAs to meet the special needs of educationally deprived children on the basis of entitlements calculated under ESEA, Title I of 1965, the intent behind the legislation is to:

- eliminate burdensome, unnecessary, and unproductive paperwork;

- free the schools of unnecessary federal supervision, direction, and control; and

- free education officials, principals, teachers, and supporting personnel from overly prescriptive regulations and administrative burdens that are not necessary for fiscal accountability and make no contribution to the instructional program.

The amount of space and emphasis given to monitoring in ECIA Chapter 1 is a marked contrast from the 1978 legislation it replaced. In fact, it has totally eliminated the monitoring and MEP provision included in the earlier law. It has also reduced the percent allowed for state administration of Chapter 1 programs from 1.5 percent to 1.0 percent.

SEA monitoring of Title I programs has thus evolved from a period in 1965 when there were no requirements, to a period in 1978 when very specific stipulations were in force, to 1982 when, once again, monitoring is no longer mandated. Thus, the last section of the monitoring section of the interview, namely the theoretical question of states' monitoring intentions under a less prescriptive law, took on added significance.

This chapter summarizes the findings of the State Management Practices Study to the questions listed above. Also included in this discussion are states' preliminary views of the impact of Chapter 1 on their future monitoring activities. The chapter concludes with opinions of a sample of districts to their states' monitoring efforts.

Implementation

Monitoring is a very time consuming, yet important part of states' Title I management activities. All but one coordinator rated monitoring as being of "moderate" or "substantial" importance in preserving the intent of the Title I legislation. A large percentage of staff time was devoted by the coordinators and their staffs to conducting monitoring activities as shown on Table 1, which presents the percentage of time reported as a function of the perceived importance of monitoring.

Table 1

Percentage of Time Spent on Monitoring as a Function of its Importance[a]

Rating	Median Percent of Time Spent	Low	High	N
Little or no importance	25.0			1
Moderate importance	30.0	30.0	35.0	6
Substantial importance	27.0	00.0[b]	50.5	41
Group Median	30.0			

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[a] Data from one state are missing.

[b] Time for monitoring could not be differentiated from time for technical assistance. See text below.

It was hypothesized initially that states giving low importance ratings to monitoring would tend to spend less time on the monitoring responsibility. While it is true that all of the states reporting the greatest amounts of time tended to rate monitoring as "moderate" or "substantial" in importance, it is significant to note that a low importance rating is still associated with a fairly high percentage of time spent on monitoring activities. This state indicated that, on the average, one-quarter of all staff time was devoted to carrying out its monitoring responsibilities.

At first glance, it may appear inconsistent to have states rate monitoring as having substantial importance, yet indicate no staff time was spent in monitoring activities. Several of these states that reported spending almost no time on monitoring indicated that monitoring was so intertwined with technical assistance that they were unable to tease apart the contribution made by monitoring from that made by technical assistance. Hence, for these states, larger amounts of time were reported for technical assistance activities.

One reason for the relatively large amounts of time spent on monitoring may be that this amount of time was needed for the states to meet the monitoring requirements of the 1978 Title I law. Answering two very important questions appeared to consume the major portion of staff time.

These are:

- How is fidelity to the application monitored?
- How is quality of service monitored?

A discussion of states' activities to answer these questions is the primary focus of the remainder of this section.

How are Fidelity to the Application and Quality of Service Monitored?

An important indicator of how each state views its relations to districts is the degree to which it uses its monitoring responsibility to help LEAs improve program quality in addition to using monitoring ensure fidelity to the application and compliance with the law. All of the states said they used monitoring to ensure compliance but only 39 said that program quality was also monitored. Attitudes toward the purposes of monitoring vary widely.

At one extreme, some states believe that the main or sole purpose of monitoring is compliance. One such state remarked that the purpose of monitoring was to check LEA practices with those presented on its application; that is, their monitors only check to see whether the district is doing what it said it was going to do in the application. Another such state said that "the Title I office considers the whole monitoring effort to be an issue of compliance." To them, fiscal credibility and accountability is the major or sole objective of monitoring.

At the other extreme, some states engage in several "extra" activities to help their districts improve program quality. Such quality-oriented activities include but are not limited to (a) using outside subject area specialists to review the program narratives in the application, (b) visits by the monitors to Title I classrooms and interviews with teachers and students, and (c) interviewing parents or Parent Advisory Council members during the monitoring visits.

While all states monitor to ensure compliance, some go beyond this and use monitoring for other purposes. The ways in which states monitor for compliance appear to be limited, as will be discussed later, and states tend to use these same methods regardless of whether they supplement monitoring with more quality-oriented activities.

Monitoring in compliance-oriented states is, in general, linked more closely with auditing than in the more quality-oriented states. For example, communication with the auditors is better, and monitoring is used explicitly to uncover problem areas for auditors. On the other hand, quality-oriented states generally tie technical assistance to monitoring, and relationships with auditors are more distant but nonetheless exist and are functional. Quality-oriented states use monitoring visits to identify areas in which technical assistance would be helpful to their districts. There appears to be greater psychological distance between monitoring and auditing in these states and less psychological distance between technical assistance and monitoring. For example, one quality-oriented state, when asked if findings from the monitoring process are used as a basis for technical assistance, said:

> That's a "chicken and egg" question. The monitoring visit is also a technical assistance visit. They aren't separable.

When the same state coordinator was asked about using the findings from monitoring as a basis for audit checks, he said:

> Occasionally they tell the auditors that they should look at a district. But I don't know if they did...

Responses to this question from compliance-oriented states were much more definite. They suggest that an established and formalized relationship between the two responsibilities exists. For example, a compliance-oriented state said that "monitoring reports are on file and available to the auditor;" another said that "monitoring reports are sent to external (fiscal) and internal (program) auditors." Another Title I coordinator said that:

> An accountant and the Title I staff work together. We check for our area of expertise and if we find something wrong we may visit the LEA together.

Monitoring for Compliance and Quality

Practically all states reported using either the application or monitoring checklists to monitor for compliance, as shown in Table 2.

Table 2

Use of the Application and Checklists to Monitor for Compliance

Use of Checklists	Use of Application No	Use of Application Yes
No	3	12
Yes	8	26

Two other methods of monitoring for compliance were also used by a substantial proportion of the states: 21 states used observation of project activities and 23 states reported using source data (e.g., evaluation data, comparability reports) to monitor for compliance. All of these methods of monitoring for compliance have one theme in common: They are amenable to standardization and quantification. Items on a checklist as on an application can simply be checked off if certain criteria (e.g., presence or absence of an item) are met.

States that emphasized monitoring for purposes of program quality, on the other hand, tended to develop more complex and elaborated monitoring methods. Greater effort may be required here, perhaps, because monitoring for program quality is harder in the sense that it relies more heavily on professional judgments and on personal contacts with LEA staff, parents, or even students. In fact, six coordinators admitted that, while they tried to monitor for quality of service, they were unsure how successful they were, because program quality was a very difficult concept to capture in a brief monitoring visit. Table 3 shows the ways in which quality is monitored by SEAs.

Table 3

Ways in which Quality of Service is Monitored

Method	Number of States
Classroom observation	21
Interviews with teachers	19
Interviews with parents and/or students	8
Look at instructional variables (e.g., class size, materials, space for project)	18
Look at teacher/aide credentials	6
Look at evaluation findings	19
Using checklists/monitoring istruments	19
Very informal measures--no official guidelines	10

A quality-oriented state may, for example, talk to parents, visit classrooms, examine achievement scores, and have subject area specialists review programs in order to make determinations of program quality. For example, one quality-oriented state said that:

> Prior to going onsite, the monitors meet with a member of the Parent Advisory Council always, privately, without LEA administrators, to get confidential private views; the team then addresses any issues raised by the PAC during the site visit:

Another quality-oriented state said that its staff:

> Spend one hour with each teacher and go over the list of children, types of services, etc., and answer their questions. We see their materials and how effective they are. They tell us what is effective. We suggest that they try other things...

Quality-oriented monitoring tends to be associated with use of multiple monitoring methods. This manifests itself in two ways. First, several qualitatively distinct methods of monitoring for quality are employed simultaneously, and, second, monitors with a wider range of backgrounds participate in the process. One quality-oriented state said that:

> Monitoring is always comprehensive but can vary in emphasis from district to district. We pay special attention to past weaknesses, routinely review records, talk to staff, visit classrooms, and have subject-area experts review programs.

In terms of staffing, this Title I coordinator said that:

> Site visits to the largest LEAs will use a team approach in which program content experts from other SEA departments (e.g., reading specialists, math specialists) will accompany the Title I staff. These people advise the Title I staff on program quality, not compliance, issues.

It is not surprising that quality-oriented states believe that this extra work does, in fact, lead to improvements in program quality. However, compliance-oriented states also reported that their activities led to improvements in program quality (all but four states said monitoring led to improvements in program quality). But because these two types of states are actually referring to different types of monitoring activities, their responses have different meanings. For example, a compliance-oriented state said that monitoring leads to improvements in program quality:

> To the extent that the regs and the law make sense (i.e., they serve an educational intent) Then to achieve compliance can result in better program quality.

Another compliance-oriented state admitted that:

> To a degree, maybe it does, but monitoring probably leads more to operating programs within the scope of the law.

Another such Title I coordinator felt that program quality was improved, because, without monitoring, the idea of a supplemental compensatory education program would die; the funds would be just used for general aid.

Perhaps the difference in attitudes between compliance-oriented and quality-oriented states is best expressed by one of the four states that said that monitoring did not lead to improvements in program quality. This coordinator said:

> No. You have to monitor for compliance with legalistic things. That doesn't always lead to quality. You can have a very good program that is illegal and a bad one that is legal.

Quality-oriented states seem to recognize this either implicitly or explicitly and therefore supplement their compliance-oriented monitoring with other activities that address the issue of quality more directly.

To obtain overall measures of the degree to which states actively monitor for quality and compliance, variables were constructed that are simply counts of the numbers of quality and compliance activities reported by each state. A subset of the items in Table 3 were selected to construct a measure of quality:

- observation in the classroom,
- interviews with teachers,
- interviews with parents or students,
- examination of teacher/aide credentials, and
- examination of instructional variables.

These were selected over the others, because it was hypothesized that these items reflected more effort in trying to monitor for quality of service than reviews of source data or uses of monitoring instruments or checklists. The activities selected to construct a measure of compliance are:

- use of the application,
- use of a checklist or monitoring instrument,
- observation of project activities, and
- reviews of source data.

The joint distribution of these variables is given in Table 4.

Table 4

Distribution of Compliance and Quality Monitoring Activities

Number of Compliance Monitoring Activities Reported	Number of Quality Monitoring Activities Reported 0	1	2	3	4
1	7	1	1	0	0
2	6	5	5	4	0
3	1	5	4	2	1
4	1	0	0	5	1

From Table 4 it is very obvious that these two types of activities are related. States that are active on one dimension are likely to be active on the other. What is striking is that states that are very active on the "quality" dimension (three or more activities) are also very active on the "compliance" dimension. Of the thirteen most active "quality" states, only four engaged in less than three compliance activities, and these four states monitored for compliance using the two obvious compliance activities, the application and a monitoring checklist. Thus, it is clear that the quality-oriented states do not neglect compliance activities in their monitoring visit; rather, these activities are supplemented with additional activities designed expressly to improve program quality.

What is not apparent from Table 4 is that states with very strong "compliance" philosophies do not necessarily manifest this attitude by engaging in many different compliance activities. That is, the archetype "compliance" state is less active generally than the archetype "quality" state. Several of the states that reported only one or two compliance activities nonetheless said that compliance or fidelity to the application was the major or only function of monitoring. Thus, a simple count of the number of activities does not necessarily capture the attitudes or philosophy of these coordinators.

This problem led to the creation of a second type of variable that was designed to reflect states' attitudes or philosophies about the purpose of monitoring. States were classified into three categories--quality, compliance, and both quality and compliance--based on their coordinators' answers to the entire monitoring interview. The compliance-attitude states believed that compliance was the only or sole objective of monitoring, and a close psychological distance between monitoring and auditing was often observed. Sample comments of these states include:

> Monitoring ensures that the dollars are spent on the right kids--without it, Title I funds might just become general aid.
>
> Monitoring prevents audit exceptions.
>
> The threat that locals will be monitored periodically keeps them in compliance.
>
> We monitor primarily to ensure compliance.
>
> The only reason we do monitoring is because the law says we have to.

The quality-oriented states tended to tie technical assistance more closely to monitoring, and, in general, engaged in some of the "extra" activities that characterize quality-oriented states. Sample comments of these states include:

> Identification of district needs for technical assistance is the key function for monitoring.
>
> It is impossible to separate technical assistance from monitoring--they go hand in hand.
>
> Monitoring is essential for improving programs and ensuring program quality.
>
> Monitoring is extremely important for locals--they can use our results to accomplish program changes that would not be acceptable to their districts at their own suggestions.

States that gave attention to both compliance and quali[illegible] issues comprised the third group. Sample comments from these state coordinators include:

> The only important functions monitoring serves are keeping LEAs legal and helping encourage program quality.
>
> I don't like monitoring--it is too time consuming--but you need it for accountability to the locals, the states, and the feds; but I feel the importance of monitoring rests with improving program quality.
>
> Monitoring serves two purposes--it provides recognition to the locals that the program is working and is important to state and federal personnel and knowledge that the program is within legal guidelines.

As Table 4 implies, this last focus is actually the most common.

Relations between Attitudes and Activities

To indicate a state's level of quality and compliance monitoring activities, the variables were dichotomized as displayed in Table 5. A state was classified as "high" on quality monitoring activities if it reported two or more quality activities; it was classified as high on compliance monitoring activities if it reported three or more compliance activities. The rationale for the higher cut-off point for the compliance measure is that, since almost all the states reported using either a checklist or the application, the higher cut-off point would differentiate those states that engaged in more than the two obvious ways of monitoring for compliance.

Tables 5 and 6 show the relationships between states' attitudes toward monitoring and each of the activity measures of quality and compliance.

Table 5

Relationship between Monitoring Attitude and Number of Compliance Monitoring Activities[a]

Monitoring Attitude	Number of Compliance Monitoring Activities Reported	
	1 or 2	3 or more
Quality	4	2
Both	13	14
Compliance	9	5

---

[a] Data from two states are missing.

As suggested earlier, the archetype compliance-oriented state is not especially active; this observation is consistent with the notion that such a state may simply be "doing what it is supposed to do."

Table 6

Relationship between Monitoring Attitude and Number of Quality Monitoring Activities[a]

Monitoring Attitude	Number of Quality Monitoring Activities Reported 0 or 1	 2 or more
Quality	3	3
Both	12	15
Compliance	9	5

---

[a] Data from five states are missing.

As is implied by Table 4, a substantial number of active quality states would be classified as emphasizing both compliance and quality. Because quality-oriented states tend to be more active than compliance-oriented states, particularly with regard to more costly, personalized kinds of activities, it is reasonable to suppose that these states have more resources to draw upon than others. However, this turns out not to be correct. States that used two or more quality monitoring activities did not differ from the others on amount of funds for state administration and the amount of setaside per LEA, nor did they differ on the number of LEAs, population, population density, or time spent in monitoring. The variable on which they differed, however, was years of experience held by the Title I coordinators.

Years of Title I experience appear to differentiate states that report any quality monitoring activities from those that do not and to differentiate those that report no quality monitoring activities from those that report four quality activities. Trying to assess the effects of this experience is most difficult. For whatever reasons, the more seasoned coordinators tend to view monitoring for program quality as being extremely important, often difficult, but they tried to do it anyway.

Demographic characteristics of states were also not related to monitoring attitude. However, the number of quality monitoring activities was related to the type of Title I unit as shown in Table 7.

Table 7

Relationship between Number of Quality Monitoring Activities Reported and Type of Title I Unit

Type of Title I Unit	Number of Quality Monitoring Activities 0-1	2 or more
• Independent		
-No regional offices	15	8
-Regional Offices	8	5
• Decentralized		
-No regional offices	3	5
-Regional offices	1	4

As evident from this table, Title I units that are decentralized, that is, units that have some administrative functions (other than auditing, which is required to be independent from Title I) housed in other units in the state agency tend to engage in two or more quality monitoring activities. This finding may be due, in part, to the fact that content specialists used by some states to review program narrative, decide on quality activities to monitor, and to provide special technical assistance to their districts to help them improve the content of their programs are often located in other divisions of the state agency--for example, in reading bureaus or in curriculum units. As described in Part Two of this report, some states use their Title I funds to pay staff in other units of the state agency (e.g., curriculum unit) or external consultants to assist them with their monitoring responsibilities. States that do not have access to such specialized curriculum personnel tend not to engage in many quality monitoring activities.

It is of particular interest that the four decentralized states reporting two or more quality activities use both content specialists located in other units of the state agency and their regional office staff to help them conduct their monitoring activities.

The fact that this relationship does not hold for the number of compliance activities tends to reinforce the hypothesis that, since compliance activities are fairly easy to quantify, no additional expertise from the state agency would be necessary to help states conduct these activities.

Other Functions Served by Monitoring

After discussing the major purposes of monitoring with the Title I coordinators, they were asked what other functions monitoring serves. These responses are classified and displayed in Table 8.

Table 8

Reports of Other Monitoring Uses

Function	Number of States
SEA keeps abreast of LEA activities	9
Establishes better SEA-LEA communications	8
Serves as a lead-in to technical assistance	34
Tightens up program--leads to improvements in quality	25
Provides formative feedback	24
Identifies exemplary practices	4
Accountability	13
Encourages valid programs	16
Compliance only	10

The interrelations among these variables are presented in Table 9.

Table 9

Tetrachoric Correlations among Measures of Uses of Monitoring[a]

	B	C	D	E	F	G	H	Compliance Only
A. LEA Activities	.60	.43	-.49	.30	-.13	-.36	.22	.09
B. SEA-LEA Communication		.38	.02	.22	.17	.21	-.14	-.40
C. Leads to Technical Assistance			.24	.20	.32	-.49	-.32	-.53
D. Leads to Improve Prog. Quality				-.16	-.01	.21	-.44	-.37
E. Formative Feedback					.55	-.21	-.12	-.34
F. Identifies Exemplary Programs						-.03	.24	-.17
G. Accountability							.44	-.41
H. Encourages Valid Programs								-.24

---

[a] Correlations of approximately .4 are statistically significant at the p=.05 level.

From these data, several conclusions can be reached:

- Most states use monitoring for more than to ensure compliance with federal law. One-half of the states said that monitoring is used to help improve the quality of Title I programs, and over 60 percent use monitoring as a lead-in to technical assistance.

- States that used monitoring for compliance only tended not to use it as a lead in to technical assistance or to improve SEA-LEA communications. However, states that used monitoring for accountability tended not to use monitoring only for compliance. That is, they also used monitoring for other purposes.

- States that used monitoring to ensure that the program was valid (i.e. complied with the law) tended not to use monitoring to help develop program quality. This finding is shown in Table 10.

Table 10

Relationship between Two Measures of Program Improvement

Encourage Valid Programs	Tightens up Program--Leads to Improvements in Program Quality No	Yes
No	13	20
Yes	11	5

The states that report using monitoring to encourage valid programs are, essentially, the low activity, high compliance-oriented states discussed earlier. Table 11 displays the relationship between monitoring attitudes and both of these measures.

Table 11

Relationship between Monitoring Attitudes and Two Measures of Program Improvement

Monitoring Attitude	Encourages Valid Programs		Tightens Up Programs	
	No	Yes	No	Yes
Quality	6	0	1	5
Both	17	10	10	17
Compliance	8	6	11	3

It is apparent that a quality-orientation or a both quality and compliance orientation is associated with the report that monitoring tightens up programs and leads to improvements in program quality, while a compliance orientation is associated with reports that monitoring encourages valid programs (i.e., legal).

The difference in emphasis on quality/technical assistance and auditing/accountability between the quality- and compliance-oreinted states is further illustrated in the Table 12.

Table 12

Relationship between Monitoring Attitude and Technical Assistance and Accountability Measures

Monitoring Attitude	Monitoring Serves as Lead-in to T.A.		Monitoring Important for Accountability	
	No	Yes	No	Yes
Quality	0	6	6	0
Both	6	21	18	9
Compliance	9	5	10	4

Again, the quality or both quality and compliance attitude is associated with providing technical assistance to districts to help them improve their programs. Reports of monitoring for accountability purposes were never mentioned by the quality-focus states.

Interrelationships with Other SEA and LEA Responsiblities

Part of Congressional intent regarding the monitoring responsibility was that the findings obtained from the monitoring process were to be used by states to provide greater attention to other related state administrative activities, such as application approval, technical assistance, auditing, and so on. In other words, if states uncovered particular implementation problems during the monitoring process, they were to use this information to tighten up the application approval process in these areas or to provide more technical assistance to districts in these areas.

Virtually all the state coordinators reported that monitoring findings were used as a basis for providing technical assistance (N=47) and for paying more attention to the application approval process (N=45). Only 37 states said that monitoring findings were used as a basis for audit checks; most of those that did not make such a report tended to cite the independent nature of the audit unit as the primary reason.

Most of the states indicated, however, that the increased attention paid to these areas by the state was on an individual district basis. Only in those few situations where lots of LEAs encountered similar problems would state-level activities be planned. Management strategies varied: When large-scale workshops were needed, some states reported use of regional office staff to conduct regional workshops for LEAs having similar problems; others reported use of mass mailings or additions to state handbooks to highlight problem areas; still others reported handling all of the problem areas as part of a regularly scheduled state-level workshops. States indicating that findings from the monitoring process served other functions mentioned a variety of activities, such as reduction of audits, identification of greatest number of problems areas for purposes of focusing the monitoring emphasis and use of monitoring findings for notifying other SEA units of state (non-Title I) standards that were violated.

While monitoring is used as a basis for all of these activities, states differ widely in their monitoring emphasis. "Quality" oriented states do not neglect their compliance responsibilities, yet it is clear that technical assistance is more closely tied to monitoring than any other responsibility. Conversely, "compliance" oriented states do use monitoring as a basis for providing technical assistance, but this responsiblity occupies a more secondary role.

Thirty-five states said that monitoring findings were used as a basis for making changes to their state-level management practices. When changes to state-level management are made on the basis of monitoring findings, these changes may be implemented to help correct compliance problems. Typical answers to this question include:

> If a common problem is observed, SEA uses this information to tighten up its application review procedures to ensure that LEAs keep implementing legal projects.
>
> When we found that LEAs were not developing sufficient complaint resolution procedures, we changed our policies so that LEAs would have to include additional pieces of information in their procedures.
>
> If state Title I personnel found that a specific recommendation has become superfluous over the years, they would change their monitoring form accordingly.
>
> Monitoring problems pointed out the need to document all failures in writing and to randomly assign monitors to districts to ensure more compliance.

While a few states responded to this question with less compliance-oriented comments, they were in the minority. For example, one respondent indicated

> Monitoring pointed out the need to increase out technical assistance efforts in the area of parent involvement. We then hired a parent involvement coordinator to handle requests for information in this area.

States were more likely (N=45) to report that findings from the monitoring process were used to institute changes to district management practices. The majority of these states, however, also hastened to add that they never "forced" LEAs to adopt changes to their management procedures, even if serious problems were encountered during the monitoring process. Instead, the states tended to report trying to tighten up the state application approval process, for example, to effect changes in district procedures or to provide lots of technical assistance to these districts so that districts might learn about alternative management strategies that might be helpful to them. In one case, a state indicated that poor district management was often associated with low achievement gains; thus, forcing the district to focus on identifying reasons for the low gains usually led to positive changes in district management procedures. The interview data seem clear in suggesting that states tried to work with their districts to effect whatever management changes were needed at the district level without resorting to an adversarial relationship between state and districts.

How is Monitoring Conducted?

Nineteen states said that they monitored every district at least once a year, ten said that they monitored every district at least once every three years, sixteen states said that monitoring frequency depended upon the size of the LEA, and only three states said that they monitored every district at least once every two years. Not surprisingly, states that are able to monitor every year tend to have fewer LEAs than the other groups, but there were no differences in number of LEAs among these three remaining groups. The states reporting annual monitoring have an average of 100 LEAs with a high of nearly 400. While the other groups have more LEAs (as many as 1,000), they appear to monitor about the same number of LEAs per year as the annual group. Thus, it appears that states, regardless of size, tend to gravitate toward monitoring approximately 100 LEAs per year.

The relationship between frequency of monitoring and a quality- or compliance orientation is complex, because it is confounded by financial and practical considerations. A reasonable hypothesis is that the more quality-oriented states would monitor more frequently. But since a quality orientation is not generally associated with greater resources, this is sometimes impossible to achieve. For example, one quality-oriented state said that it switched from annual monitoring to monitoring every three years because it could no longer afford to spend enough time per LEA to make annual monitoring work. On the other hand, the four decentralized states reporting high levels of quality monitoring shown in Table 7 indicated that they were able to monitor all districts annually, since their regional offices played a major role in the conducting of monitoring visits.

There is a tendency for a compliance orientation to be associated with monitoring every three years as shown in Table 13. This may be due to the fact that the law does not require more frequent monitoring, and these states are doing what is necessary to be in compliance. On the other hand, a substantial proportion of these states monitor annually as well.

Table 13

Relationship of Monitoring Frequency to Number of Compliance Monitoring Activities Reported[a]

Monitoring Frequency	Number of Compliance Monitoring Activities Reported 1 or 2	 3 or more
Annual	13	6
Two years	1	2
Three years	2	8
Depends on Size	12	4

---

[a] Data from one state are missing.

Who Conducts Monitoring

The majority of state Title I coordinators (N=31) reported that monitoring is conducted entirely by their Title I staffs. A sizable group reported that their staffs were assisted in the monitoring process by other content specialists (e.g., curriculum personnel) within the SEA (N=9) or by external consultants hired expressly for the job of conducting monitoring visits (N=2). The content specialists involved in the monitoring process performed a variety of functions--for example, serving as part of a monitoring team that visited LEAs or serving as advisors to the Title I staff in the development of monitoring instruments to assess program quality in specific subject matter areas. While the number of content specialists involved in any one state was rather small, (a range of 0 to 4), some states using external consultants tended to employ as many as 500 of these personnel to assist in onsite monitoring. In four states, regional offices had primary responsibility for the monitoring of district programs. Eight states reported that the monitoring responsibility for Title I was coordinated with the monitoring for a state compensatory education program or with some other federal program.

Seventeen states reported that they used teams to conduct the onsite monitoring visits, while eleven other states said that they used either individuals or teams depending on the size of the district. The remaining seventeen states reported using individuals only. The states using teams had greater resources available to them than the other groups--more professional staff available for monitoring, more administrative funds, and more total state educational revenue. However, these variables did not differentiate the states using individuals from the states using both individuals and teams.

While greater resources appear to be available to states using teams, indicators of quality-oriented monitoring are associated with the use of both individuals and teams. As is shown in Table 14, the number of quality monitoring activities is strongly related to this mode of operation.

Table 14

Relationship between Number of Quality Monitoring Activities and Monitoring Staffing[a]

	Number of Quality Monitoring Activities Reported	
Monitoring Staff	0 or 1	2 or more
Individuals	11	6
Teams	11	6
Both	2	9

---

[a] Data from four states are missing.

The use of either teams or both individuals and teams is strongly associated with the use of monitoring as a lead-in to technical assistance as shown in Table 15.

Table 15

Relationship between the Use of Monitoring and Monitoring Staff[a]

	Serves as a Lead-in to Technical Assistance	
Monitoring Staff	No	Yes
Individuals	8	9
Teams	4	13
Both	1	10

---

[a] Data from four states are missing.

From the interviews it is apparent that the use of additional personnel associated with quality activities by these groups accounts for these relationships. Content experts or external consultants are obviously more likely to be found in the latter two groups, and their presence is related to the close psychological distance between monitoring and technical assistance that characterizes a quality orientation.

The use of either teams or both individuals or teams is also related to the type of Title I unit. All of the decentralized states use either teams or both individuals and teams as shown on Table 16.

Table 16

Relationship between Type of Title I Unit and Monitoring Staff[a]

Type of Title I Unit	Monitoring Staff Individuals	Teams	Both
• Independent			
-No regional offices	12	4	7
-Regional offices	5	7	0
• Decentralized			
-No regional office	0	5	2
-Regional offices	0	1	2

---

[a] Data from four states are missing.

In this sense, the states using individuals for monitoring are "smaller" than the remaining states, despite the fact that they do not differ on demographic variables. Thus, their "smallness" refers to the type of Title I office they have rather than financial or human resources.

Eight of the states reported that monitoring is coordinated as part of monitoring for a state compensatory education program or other federal programs. Seven of these states reported using teams, and the remaining state reported using both individuals and teams. Thus, these two variables are highly related, and both are correlated with demographic variables measuring size and amount of resources. The states reporting that Title I monitoring is coordinated with monitoring for other programs have more administrative funds, more Title I and total educational revenues, and more monitoring staff. They are also larger and more urban states (higher population and more medium size and large towns and cities). They did not differ on proportion of time spent on monitoring, years of experience of the Title I coordinator, population density, or number of LEAs. They also did not show any clear relationship between any of the indicators of quality/compliance emphasis. These eight states evidently represent a mixture of attitudes toward monitoring.

Use of LEA Self Assessments

Eleven of the state Title I coordinators volunteered that they shared copies of their state monitoring instruments or agenda with districts in advance of state onsite monitoring visits so that districts could conduct self-assessment checks of their own before the official monitoring visits took place. Four other Title I coordinators indicated that their LEAs were required to conduct their own self-assessments using either an instrument developed by the district or the official monitoring instrument developed by the state. Together, 17 of the states indicated the importance of LEA self assessments.

Although the idea behind having districts monitor themselves may have been to encourage program quality, the data collected here suggest that the use of LEA self-assessments is actually related to a compliance orientation. This variable was not related to the measure of monitoring attitudes, but it was related to the number of compliance monitoring activities as shown in Table 17.

Table 17

Relationship between Use of LEA Self Assessments and Number of Compliance Monitoring Activities Reported

Use of LEA Self Assessments	Number of Compliance Monitoring Activities Reported 0 - 2	3 or more
No	24	8
Yes	4	13

It appears that LEA self-assessments are being used as a method of achieving compliance as opposed to a method for improving program quality.

Involvement of Parents in the Monitoring Process

Fifteen states indicated some involvement of parents or members of Parent Advisory Councils in the monitoring process--either as part of the state monitoring team or as interviewees at the local district. These states appear to be the large and less highly populated western states: Their population is smaller than those states that do not report involvement of parents, their population density is smaller, and they have grown more from 1970 to 1980. They received smaller Title I allocations, had smaller total revenues, fewer LEAs, smaller Title I staffs, and smaller staffs available for monitoring. However, the involvement of parents is not related to the quality and compliance measures discussed above.

On the other hand, attitudes toward parent involvement, as assessed by the summary measure described in the chapter on Parent Involvement, are strongly related to a quality orientation. States that are positive about parent involvement tend to engage in more quality monitoring activities, have a quality orientation as measured by the attitude variable, and use monitoring as a lead-in to technical assistance. In addition, states with a negative attitude toward parent participation are more likely to use both monitoring for compliance and monitoring to ensure program quality as shown in Table 18.

Table 18

Relationship between Parent Involvement Attitudes and Quality and Compliance Monitoring Activities

	Monitoring Activities			
	Number of Quality Activities Reported		Number of Compliance Activities Reported	
Attitude toward Parent Involvement	0-1	2 or more	1-2	3 or more
• Positive toward parent participation and pro-PACs	1	3	2	2
• Positive toward parent participation and less pro-PACs	10	14	13	11
• Positive toward parent participation and anti-PACs	11	6	9	8
• Negative toward parent involvement and anti-PACS	2	0	2	0

Taken together, this set of findings suggests that merely involving parents in the monitoring process is not an indicator of a quality orientation; however, a positive attitude toward parent participation in the Title I program is an excellent predictor of a quality monitoring orientation.

Relationship of Quality Monitoring to Use of Other Responsibilities

In the chapter on Rulemaking, it was noted that active makers of quality rules were also active in monitoring for program quality as expected, while less active rulemakers were not (see Table 14 of that chapter). This relationship did not hold when rulemaking activities were examined as a function of compliance monitoring activities (see Table 20 of that chapter).

In the chapter on Application Approval it was argued that successful use of the three-year cycle is associated with an active, problem-solving stance. Since quality monitoring appears to require more innovation and resourcefulness than compliance monitoring, it is reasonable to hypothesize that successful users of the three-year cycle would tend to have a quality orientation. This, in fact, turns out to be the case as shown in Table 19.

Table 19

Relationship between Monitoring Attitude and Use of the Three-year Application Cycle[a]

	Three-year Cycle Use		
Monitoring Attitude	No	Yes, No Paperwork Reduction	Yes, Paperwork Reduction
Quality	1	1	4
Both	9	5	11
Compliance	5	4	4

---

[a] Data from five states are missing.

As Table 19 shows, the relationship between success in the use of the three-year cycle and monitoring attitudes is monotonic. Furthermore, the relationship is in the expected direction for both the compliance and quality activity measures as shown in Table 20.

Table 20

Relationship between Three-year Cycle Use and Number of Quality and Compliance Monitoring Activities

	Monitoring Activities			
	Number of Quality Activities Reported		Number of Compliance Activities Reported	
Three-year Cycle Use	0-1	2 or more	1-2	3 or more
No	8	8	9	7
Yes, No Paperwork Reduction	8	3	5	6
Yes, Paperwork Reduction	10	9	13	6

Thus, activities in three different areas are related: As is discussed in the chapter on application approval, successful users of the three-year cycle tend to be much more active in the area of parent involvement; states with a quality monitoring orientation have a more positive attitude toward parent involvement; and states with a quality monitoring orientation also tend to be the successful users of the three-year application approval cycle.

This configuration of attitudes and activities is characterized by an active, problem-solving stance and a tendency to engage in several diverse activities, beyond that which is required by law to help achieve program quality. It is noteworthy that this configuration is _not_ correlated with any major demographic or resource variables. Such an association would have suggested that higher levels of activities are a function of greater staff or financial resources. Instead, this configuration is due more to a philosophy or approach to the management task and is more clearly related to differences in values and orientation than to resources or state demographic characteristics.

Changes

When asked what changes they had made to their monitoring practices to implement the provisions of the 1978 Title I law, 35 of the Title I coordinators indicated some management changes. Increases in staffing (N=8), increases in frequency of monitoring (N=9), and changes in moni- toring content to reflect the content changes of the 1978 Title I law (N=9) were cited moderately often. Other types of changes reported include changes to coordinate the monitoring of Title I with the state's compensatory education program, a shifting in emphases to more monitoring of schools, closer monitoring of lowest achieving schools, and a shift to monitoring whatever decisions are made by locals (a school-based management approach).

A sizable number of coordinators (N=23) indicated that they changed their monitoring process to be more comprehensive, structured, or formalized after the introduction of the 1978 law. While population, allocation, and staffing of these states did not differ as a function of whether such process changes were reported, there was a slight trend to suggest that these states reported spending a larger proportion of their time on monitoring than those states that did not report similar structured changes. A larger proportion of these states also had state compensatory education programs (43% vs 31%), but they were not likely to report that Title I monitoring was coordinated with monitoring for these state compensatory education programs. This finding suggests that the states reporting coordination of monitoring with other state or federal programs formalized their procedures at the time of the coordination and not as a result of the 1978 Title I law. In fact, of the eight states that reported coordinating Title I monitoring with monitoring of other programs, only one reported initiating coordination of monitoring with its state compensatory education program after 1978.

The states reporting more structured changes tended to report greater use of teams to conduct monitoring, while those states not reporting such changes tended to rely on individuals to conduct monitoring as shown in Table 21.

Table 21

Relationship between Reports of Changes to Monitoring Process and Monitoring Staff[a]

	Monitoring Staff		
Process Changes	Individuals	Teams	Both
No	11	7	6
Yes	6	10	5

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[a] Data from four states are missing.

Despite the fact that the use of teams seems to be associated with a more quality focus, reports of changes made by states to make their monitoring process more structured were not related to the quality-compliance orientation discussed earlier.

Prior to the interviews, informal discussions with a few state Title I coordinators suggested that the increased monitoring requirements may be too time consuming, that states may have less time now to spend providing technical assistance to districts or on helping districts to improve their programs. To our great surprise, only one Title I coordinator volunteered this response when asked what changes were made as a result of the implementation of the monitoring provision. While some of the coordinators spoke out strongly against the greater emphasis placed on monitoring in the 1978 Title I law, it appears that almost all developed ways to ensure that technical assistance or attention to quality issues did not suffer.

Desire for Monitoring Models

Almost one-half of Title I coordinators (N=22), when asked whether monitoring models would be helpful to them, indicated affirmatively. Common answers to this question were a desire for monitoring instruments, desire for monitoring examples as long as they were not mandates, and models for quality as well as for compliance. These states could not be differentiated from the others by any of the population, allocation, or staffing variables. The only descriptive variable that appeared to differ as a function of preference for models was the percentage of time spent in monitoring: Coordinators who indicated a preference for models also indicated that more time was spent in monitoring. Three coordinators who were unsure of whether models would be helpful reported that they spent approximately 50 percent of staff time conducting monitoring activities. It may be that models, or examples, are desired by these coordinators to help them reduce the amounts of time they spend in this area.

Preference for monitoring models, however, was not related to any of the quality/compliance orientation variables. No overall trends were apparent; however, several small features in the data merit comment.

Some states (N=13) were very adamant about wanting monitoring models or examples and that the monitoring models not be mandated. These states tended to be characterized as having large monitoring staffs, and significant influxes of population over the last 20 years. Ten of these states were categorized as having a compliance or both compliance and quality orientation; and eight of them reporting conducting 0 or 1 quality monitoring activities.

Five states indicated they were satisfied with the models they were currently using. Four of these states were characterized as having a quality (or both compliance and quality) orientation.

Thus, while no overall trends were observed with preferences of states toward models, some weak evidence (based on the small number of responses) suggests that compliance-oriented states are more likely to want models, while the quality-oriented states are likely to be satisfied with the processes and materials they are currently using. This trend is in the expected direction similar to that noted in the application approval chapter--quality states are less likely to want models, since they tend to feel more responsible for taking charge of their management activities.

Problems

When asked whether the monitoring provisions in Section 167 caused problems for them, 38 of the state Title I coordinators responded affirmatively. Table 22 lists the problems mentioned.

Table 22

Reports of Monitoring Problems

Problem	Number of States
Problems caused by language of Section 167	4
Problems cause by LEA requirements	33
Insufficient funds to implement provision	4
Staffing (quality, training) problems	4
Too much effort required	6
Increased effort means less time spent on quality or technical assistance	2
SEA does not like to be heavy arm of law	6

Analyses examining the presence of problems as a function of state characteristics shows that none of the population, allocation, or staffing variables are statistically significant. This finding is not too surprising, considering the diverse nature of the problems reported.

Difficulties caused by the language of Section 167 or the regulations were reported by four coordinators. These difficulties reflect the diverse nature of the problems reported overall: problems caused in the districts by the sending of a copy of the state's monitoring report to the PAC chairperson; such frequent monitoring is unneccessary in small states where the state Title I staff knows all of the LEAs very well; too much time is spent monitoring the small LEAs with small allocations--withholding funds in these places results in the collection of "nickels and dimes" and is not worth the time and money it takes to collect it.

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A sizable number of the coordinators (N=33) reported that one or more of the district requirements were problematic in the monitoring process. Table 23 presents the number of problems reported for each district requirement.

Table 23

Reports of Monitoring Problems by District Requirement

Type of Problem	Number of States
Funds Allocation	
• Maintenance of effort	3[a,b]
• Excess costs	8[a]
• Supplement, not supplant	13[a,b]
• Comparability	9[a]
Targeting and Eligibility	
• Designating school attendance areas	7[a]
• Children to be served	7[a]
• Private school participation	5[a]
• Schoolwide projects	1
Program Design	
• Purpose of program	1
• Assessment of educational need	6[a]
• Planning	1
• Sufficient size, scope, and quality	7[a]
• Expenditures related to ranking of project areas and schools	5
• Coordination with other programs	4
• Information dissemination	3
• Teacher and school board participation	4[a]
• Training of education aides	3
• Control of funds	2
• Construction	0
• Jointly operated programs	1
• Accountability	1
• Complaint resolution	4
• Individualized plans	4[a]
• Noninstructional duties	7
Evaluation	
• Evaluation	4
• Sustaining gains	3

Table 23 (continued)

Type of Problem	Number of States
Parent Involvement	
- Parent participation	5[a,b]
- Parent Advisory Councils	16[a,b]

---

[a] These items were mentioned as being a "major" problem by at least one state Title I coordinator.

[b] These items were mentioned as being a "major" problem by at least one-half of the state Title I coordinators who reported it as a problem.

As evident from the table, the funds allocation, targeting and eligibility, and parent involvement requirements caused major problems for the coordinators as they tried to conduct monitoring of local projects. A comparison of this table with Table 12 in the Application Approval chapter shows that these same requirements were problematic during the application approval process as well. This observation is not unexpected. Uncertainty first about how to interpret a requirement and second how much information to collect on the application to be satisfied that local projects are in compliance with the requirement are undoubtedly related to the ability (or inability) to monitor this information.

All of the six states reporting use of external contractors and use of regional offices to conduct monitoring reported problems, but, in only one-half of these cases were the reported problems related to the staffing. Some of their comments include:

> Keeping the regional office staff coordinated with our own (central office) staff is a problem.
>
> Training for the many hundreds of people hired to conduct the monitoring is insufficient.

An examination of the six states reporting that the monitoring provisions took too much effort also shows that these states were also very active monitors: all reported using two or more ways to monitor quality of service, and four of these also reported using three or more ways to monitor compliance areas. While one of these coordinators reported spending more than one-half of all staff time on monitoring (which was the highest percentage reported overall by any of the coordinators), the percentages of time reported by the other five do not reflect inordinately high percentages of time spent on this activity.

It was hypothesized that a less supportive and helpful stance by the Department of Education as perceived by states might be associated with reports of monitoring problems. This relationship is presented in Table 24.

Table 24

Reports of Monitoring Problems as a Function of Perceived Helpfulness from ED[a]

Presence of Problems	Helpfulness of ED Hindered	Somewhat Helpful	Helpful	Neither/ Not Consulted
No	0	3	4	4
Yes	2	7	13	11

---

[a] Data from five states are missing.

From this table it is apparent that a less helpful or neutral relationship with ED is associated with reports of monitoring problems.

Of the 13 states indicating that "monitoring for quality of service is difficult to do, but we try," 11 reported problems, some of which related to not having enough time to devote to quality issues. Since the establishment of quality monitoring activities was felt to be particularly difficult for some states, and perhaps an area that could have been facilitated by the development of a Policy Manual, the states' attitudes toward monitoring were hypothesized to be affected by the help they received from ED. This relationship is shown in Table 25.

Table 25

Relationship between Perceived Helpfulness of ED and a Quality-Compliance Orientation[a]

Monitoring Attitude	Helpfulness of ED Hindered	Somewhat Helpful	Helpful	Neither/ Not Consulted
Quality	0	1	3	2
Both	1	3	11	9
Compliance	1	6	2	3

---

[a] Data from seven states are missing.

From this table it is apparent that the states characterized as having a compliance or both compliance and quality orientation perceived ED as being less helpful.

Presence of monitoring problems, however, is not related to any of the measures of quality-compliance discussed in this chapter.

Exemplary Practices

When asked whether the state Title I coordinators had developed any monitoring practices that could be considered exemplary and that could be shared with other states, 37 answered in the affirmative. Sixteen states reported development of exemplary processes, while twenty-seven reported development of materials. Table 26 presents a listing of the exemplary processes and materials developed by these coordinators.

Table 26

Reports of Exemplary Monitoring Practices

Practice	Number of States
• Exemplary Processes Developed	
-Team approach	4
-Onsite review process	12
-Coordinated monitoring approach	3
-Feedback from monitoring to LEAs	2
• Exemplary Materials Developed	
-Monitoring checklist	11
-Monitoring instruments, handbook, MEP	14
-Monitoring feedback reports	4
-Program review guides	1

The states that reported developing exemplary processes are characterized by larger central office staffs and greater numbers of staff available for monitoring, but by no other state demographic characteristics. Interestingly, the 22 states producing either exemplary materials or processes did not differ from those states that did not report such production in terms of the percentage of time spent on monitoring or in terms of years of experience of the coordinators. Since relationships with both these variables were observed in earlier discussions, especially regarding implementation of monitoring for quality of service, it was expected that they might be significantly related to production of exemplary practices discussed here.

One initial hypothesis held prior to data collection was that development of exemplary practices might be associated with reports of monitoring problems--that processes or materials might be developed to overcome problems. An examination of the data shows that this hypothesis was not supported.

States' relationships with ED were also believed to play a key role in the development of exemplary practices or materials. It had been thought initially that, had the policy manual being drafted by ED been completed as scheduled, helpful monitoring materials would have been distributed to states, which would have obviated the development of their own materials. The fact that the policy manual was never completed implied that gaps in such assistance might exist (e.g., in the area of monitoring checklists), and these gaps might have stimulated states to develop their own materials. Table 27 presents the production of exemplary monitoring practices as a function of the perceived helpfulness of ED.

Table 27

Production of Exemplary Monitoring Practices as a Function of Perceived Helpfulness from ED[a]

	Helpfulness of ED			
Development of Exemplary Monitoring Practices	Hindered	Somewhat Helpful	Helpful	Neither/ Not Consulted
No	1	2	2	3
Yes	1	8	15	12

---

[a] Data from five states are missing.

This table shows that the states reporting development of exemplary monitoring materials or processes tended to perceive ED as being more helpful than those states that reported no development of exemplary materials. Some of the comments made by states to this question include:

> ED was supportive of our efforts to develop our monitoring system.
>
> ED encouraged us to develop a monitoring checklist.
>
> ED shared monitoring materials from other states with us.
>
> ED sent monitoring-related materials to us for dissemination to our LEAs.

> ED encouraged us to do as much as we could in the area of monitoring depending on the funds available.

While the help given by ED was often in the form of encouragement or reviews of materials or sharing of materials from other states to stimulate development of materials by a state, nevertheless it does not seem to be the case that states developed materials to overcome a "hindering" relationship with ED.

To identify more clearly what kinds of states developed exemplary monitoring practices, production was examined as a function of monitoring attitudes as shown in Table 28. From this table it is apparent that production of exemplary practices is associated more with a quality or both quality and compliance orientation.

Table 28

Production of Exemplary Practices as a Function of Monitoring Attitude[a]

Production of Exemplary Practices	Monitoring Attitude: Quality	Both	Compliance
No	1	4	4
Yes	5	21	9

---

[a] Data from five states are missing.

Since monitoring checklists and instruments were hypothesized to be items more likely produced by compliance-oriented states, while use of special consultants was known to be associated with quality monitoring as described earlier, further examinations of materials development were made as a function of the quality-compliance attitudes held by states as shown in Table 29.

Table 29

Development of Exemplary Processes and Materials as a Function of Monitoring Attitude[a]

Monitoring Attitude	Development of Exemplary Processes No	 Yes	Development of Exemplary Materials No	 Yes
Quality	3	3	3	3
Both	16	9	8	17
Compliance	11	2	6	7

---

[a] Data from five states are missing.

From this table it is apparent that more quality-oriented states report production of exemplary processes; while compliance-oriented states do not tend to report developing exemplary processes. Of the two compliance-oriented coordinators who did, both reported an exemplary process for the actual conduct of onsite monitoring reviews, which is not inconsistent with the earlier discussions of states holding a compliance orientations. The states having both a compliance and quality orientation tend to be very active producers of practices, especially in developing exemplary materials.

Different kinds of materials tended to be associated with the quality-compliance orientations held by states. All but one of the five states reporting development of a monitoring feedback process or monitoring feedback reports were states reporting at least one quality monitoring activity, and none of these states was labeled as a compliance-oriented state. On the other hand, of the eleven states reporting development of a monitoring checklist, only one was labeled as a quality-oriented state.

Continuation

At the end of the monitoring section of the interview, states were asked whether they would continue to monitor if there were no or minimal legal requirements for them to do so. Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As part of the interviews conducted onsite to a representative sample of 20 states, state-level personnel were queried specifically about their continuation plans under Chapter 1. By this time, Chapter 1 requirements were a little better understood, and state coordinators were beginning to make plans as to what aspects of their

Title I practices would or would not be included as part of Chapter 1 management.

The discussion on continuation plans is presented in two parts. The speculative answers provided by the 49 Title I coordinators during the telephone interviews will be summarized and interpreted first. The information obtained from the 20 state Title I coordinators in response to specific probes about their plans to monitor under Chapter 1 will be presented next.

Monitoring Plans: A Speculation

The answers of the coordinators to the theoretical question, whether they would continue to monitor if it were not expressly required by law, are summarized in Table 30.

Table 30

Monitoring Continuation Plans

Plan	Number of States	
• Don't know	3	
• Yes (plans unspecified)	2	
• Similar to current practice	23	
- Monitor for fiscal accountability		11
- Monitor for program quality		11
- Insure integrity to application		1
• Modified practices	12	
- Monitor all districts but less frequently		6
- Monitor fewer requirements		4
- Simplify examinations of source data (e.g., comparability reports or maintenance of effort)		3
- Other modified practices (e.g., monitor smaller districts less frequently		3
• Different practices	9	
- Monitor less for program compliance and more for program quality even if adherence to compliance suffers		4
- Involve LEAs on decisions about what items should be monitored		4
- Include as part of state law or as part of state requirements for other educational programs		3

From the table it is apparent that all but three coordinators definitely plan to continue some sort of monitoring activities. Continuation for 23 of the states is expected to take a form similar to that being done at present, while 21 indicated they would like to change some feature(s) of their current practice. Of the coordinators wishing to change their monitoring activities, 12 wanted to expend less effort in monitoring generally either by monitoring less often or by moniorlng fewer requirements.

States' continuation plans could not be differentiated on the basis of any population, allocation, or staffing variables.

A sizable number of the state Title I coordinators (N=20) indicated that implementation of their continuation proposals depended upon the wishes of their chief state school officer or other state-level policy makers. These states were characterized by an influx of population from 1970 to 1980. The coordinators of these states also tended to have fewer years of experience with the Title I program than those coordinators who did not similarly qualify their continuation proposals. Of these ten states, only one state proposed different monitoring practices, five states proposed similar practices, and the remaining states were either unsure of continuation or did not specify what kinds of activities they would include. It was surprising that more of the states proposing different practices did not also report a greater degree of dependency on their state decisionmakers.

It was originally hypothesized that continuation of a particular state management responsibility might be a function of the importance placed on it by the Title I coordinators. Since almost all coordinators indicated that they would want to continue monitoring, continuation was defined for the remaining discussions in terms of the similar, modified, or different proposals made by the respondents. Of those proposing similar practices, 95 percent rated monitoring as having substantial importance; 88 percent of those proposing different practices rated it as having substantial importance; only 63 percent of those with modified practices rated it as having substantial importance. The modified group tended to include a number of states that wanted to do less monitoring than is currently required. Thus, it may be that these states are generally less satisfied with monitoring than either the "similar" and "different" groups, which appears to be reflected in these importance ratings.

It was also hypothesized that another indicator of importance as far as continuation is concerned may be the development of exemplary materials. It had been thought that states that invested time and effort in the development of exemplary materials might be more likely to continue monitoring than those with less investment. In fact, 90 percent of the states proposing similar plans states reported development of exemplary practices, 81 percent of the states proposing modified plans reported exemplary practices, while only 66 percent of the states proposing different plans reported exemplary practices. This finding was somewhat surprising in light of the high ratings given to monitoring by the "different" group.

An examination of these continuation plans as a function of the quality-compliance orientation held by states is shown in Table 31.

Table 31

Initial Continuation Plans as a Function of Monitoring Attitude[a]

Continuation Plans	Monitoring Attitude Quality	Both	Compliance
Similar to Current Practice (including unspecified plans)	4	14	5
Modified Practices	1	7	4
Different Practices	0	4	5

---

[a] Data from five states are missing.

Only one of the quality-oriented states reported wanting to change monitoring activities, while most of the compliance-oriented states wanted to change their monitoring practices. Since some of the compliance-oriented states indicated that they did monitoring only because it was required by law, it is not surprising that these states might want to do less in the future or consider different alternatives to monitoring. Some of these attitudes will be explained in more detail in the next section of this chapter.

Although the "different" states were less likely to report development of exemplary practices, two-thirds of them indicated they wanted monitoring models, while the other two groups of states tended to be equally divided in their preferences for models. It is reasonable perhaps, that the states proposing to implement different management strategies would be most interested in receiving helpful ideas or examples.

One indicator that had been expected initially to differ as a function of continuation is frequency of monitoring. It was held that states doing annual monitoring might feel that monitoring was more important than states that conducted monitoring less frequently. Thus, states choosing to monitor more frequently were expected to be more likely to continue monitoring if it were not required. Approximately one-half of the states proposing similar and modified monitoring plans did, in fact, report monitoring every year, while none of the states proposing different plans reported monitoring every year. More than one-half of the "different" states reported that monitoring frequency depended upon the size of the LEAs. These data suggest that more frequent monitoring may be more conducive to continuation proposals that are more similar to current practices.

One other indicator of effort expended, which was felt might also be related to continuation, was the percentage of time spent on monitoring. While the amount of time spent could be viewed as "too much effort required" rather than as an indicator of the amount of time expended by choice, analyses were conducted to examine the continuation responses of states as a function of time reported spent on monitoring. A weak relationship was observed in that states reporting different proposals also reported spending more time than those states reporting similar or modified proposals.

All of these findings taken together raise an interesting question. If the states proposing different monitoring activities do not tend to monitor more frequently or develop exemplary materials, in what activities do they engage that could result in so much more time spent? One possible reason for the additional time spent may be that all of the states reporting different plans also tended to report monitoring problems as shown in Table 32.

Table 32

Initial Continuation Plans as a Function of Problems Reported[a]

Continuation Plans	Problems Reported No	Problems Reported Yes
Similar to Current Practices (and unspecified)	10	15
Modified Practices	2	11
Different Practices	0	9

---

[a] Data from two states are missing.

While problems with LEA requirements were reported by all but one of the different states, other frequent problems reported were too much effort required (N=2), insufficient funding to implement (N=2), and different problems caused by the language of Section 167 (N=2). While problems apparently did not cause these states with different continuation plans to rate monitoring as having a low importance, the presence of problems may have led these states to more serious consideration of alternative monitoring strategies.

Table 32 also shows that the states with modified continuation plans also tended to report problems. Problems reported by the modified states include problems with specific LEA requirements (N=3), problems with the state not wanting to be the heavy arm of the law (N=3), and different problems caused by the language of Section 167 (N=2). Whether the loss of face as reported by some of the states that they encountered in having to be the heavy arm of the law led to lower importance ratings is not certain. These problems did apparently lead states to feel that less frequent monitoring or less active monitoring in the future would be better than frequent and intense monitoring currently reported.

Thus, while amount of effort expended on monitoring (e.g., frequency, exemplary materials) may be one indicator of continuation of similar practices, the presence of numerous problems may cause states to consider alternative continuation proposals.

Monitoring Plans: Preliminary Views of Chapter 1 Impact

During subsequently conducted onsite interviews to a sample of 20 states, the Title I coordinators were probed specifically about their plans to include some kind of monitoring activities in their Chapter 1 program management and about what problems they might anticipate in carrying out these monitoring activities. So that the comments of these coordinators can be placed in perspective, a summary of their past monitoring activities is included in Table 33.

Table 33

National Sample of 20 States:
Description of Past Monitoring Activities

Variable	Number of States	Variable	Number of States
• Monitor		• Desire for models	
-Title I unit	12	-No	10
-Title I & content specialists	3	-Yes	8
-Title I & external consultants	1	-Don't know	1
-Regional office	4	• Presence of exemplary practices	
• Types of monitors		-No	4
-Individuals	8	-Yes	16
-Teams	5	• Number of ways quality is monitored	
-Both	5	-0 or 1	8
		-2 or more	12

Table 33 (continued)

Variable	Number of States	Variable	Number of States
• LEA involvement		• Number of ways compliance is monitored	
-LEA self assessments or sharing of SEA instrument with LEAs	8	-0 to 2	8
• Parent involvement		-3 or more	12
-As monitors or as interviewers	7	• Monitoring orientation	
• Monitoring frequency		-Quality	4
-Annual	8	-Both quality & compliance	11
-Every 3 yrs	6	-Compliance	5
-Depends upon size	6	• Presence of problems	
		-No	4
		-Yes	16
		• Initial continuation plans[a]	
		-Similar	9
		-Modified	4
		-Different	4
		-Don't Know	3

---

[a] Data collected during initial telephone interviews

As evident from the table, the states in the national sample tended to be very active in the area of monitoring. Thus, it is of particular interest to determine whether these state coordinators specifically plan to continue monitoring under Chapter 1, since monitoring is not a required activity.

Of the 20 coordinators,

- 3 indicated continuation of monitoring similar to what is being done at present,
- 8 indicated plans to do less monitoring in the future, and
- 9 indicated monitoring plans that differed from those being done at present.

Only one coordinator indicated that he was not planning to continue monitoring actitivies. This coordinator, however, indicated that he would continue to make an annual "evaluation" visit to LEAs, which, for all intents and purposes, is a monitoring-like activity that includes a heavy focus on technical assistance.

An examination of these continuation responses with those summarized in the previous table shows that only two of the nine coordinators who had initially wanted to continue similar monitoring activities reported similar continuation plans during the later interviews. The coordinators who originally proposed to do less monitoring or to do different monitoring activities tended not to deviate from these plans in the later interviews. Table 34 presents the later continuation plans for monitoring as a function of the earlier response given during the telephone interview.

Table 34

National Sample: Changes to Monitoring Continuation Plans as a Function of Prior Expectation

Current Emphasis	Number of States
Same emphasis as previously expected	7
Less emphasis than previously expected	6
Different emphasis than previously expected	7

Comments of the states reporting that less emphasis will be placed on monitoring in the future than they had anticipated cited fewer dollar resources under Chapter 1 and fewer administrative staff as the primary reasons. Their plans generally included less frequent monitoring visits to all districts or monitoring in fewer areas. Sample comments include:

> We will concentrate our limited resources to protect LEAs in compliance matters. We will cut back in technical assistance.
>
> We may have to monitor districts every four or five years instead of every three years.
>
> With fewer staff, we will monitor less often.
>
> With fewer staff, we will invest less effort in monitoring, and we will monitor less often.
>
> We will do monitoring less often and to fewer LEAs--mainly those needing the most assistance. We will also reduce the number of areas covered.

> We will monitor to a lesser degree. We'll have fewer staff, conduct fewer visits, and review fewer program activities.
>
> We will concentrate on the large districts and pay less attention to the many smaller ones around the state. Monitoring or auditing the extremely tiny districts is akin to going after the nickels and dimes--the real compliance problems are not there.
>
> We may not have the resources to monitor for quite as much, but we will definitely monitor.

One might expect from the discussions early in this chapter that the compliance-oriented states would tend to want to do less monitoring in the future. In this sample of 20 states, 5 were labeled as having a compliance orientation. Only one of these, however, had a low activity, compliance orientation, the remaining four tended to view monitoring as important for accountability and, as such, tended to be more active monitors generally. Sample comments from these state coordinators are:

> We cannot afford to give up monitoring. We cannot rely on "paper" monitoring, since LEAs will make up anything to satisfy us regardless of the truth.
>
> While we will be forced to do less monitoring than before because of shrinking dollars, the threat of monitoring will keep people honest.
>
> Because of monetary and staff limitations, we will do monitoring in a limited, mickey mouse way. We will have a much reduced effort--we won't be able to do as much.

The comments made by some of the compliance-oriented states shows a relatively heavy emphasis on providing technical assistance. In fact, one of these state coordinators indicated that, since the threat of monitoring and audits was generally felt to be sufficient to keep districts legal, they felt they could reduce their monitoring effort slightly without affecting the legality of their programs. The savings in time gained from moni- toring less frequently could be applied to providing more technical assis- tance to their districts.

In fact, a number of states--regardless of their quality or compliance orientattion--appeared to make plans to continue monitoring under the guise of providing technical assistance. A further look at a few of these states showed that they fit the "local control" picture described in the Rulemaking chapter--these states were active in making informal rules to help districts improve quality programs, but they were very careful not to project a directive image to their districts. Since a decision to monitor actively under Chapter 1 might be interpreted as an inappropriate activity for a nondirective state, this may account for the large number of future monitoring plans that contain a heavy focus on technical assistance. Sample comments of some of these coordinators are:

> I don't know how much monitoring the department will let me do. We may set up a monitoring group that monitors across many programs.
>
> Monitoring is a necessary evil. We have to do some. We do it to get to the technical assistance part of things.
>
> The emphasis in monitoring will be different--we will focus more on achievement and less on how the dollars are spent.
>
> The bottom line lies with the auditor. The SEA is willing to help LEAs become legal. However, we will not call it monitoring, but voluntary program review by request of districts. This program review will be like monitoring, and probably all LEAs will want it.
>
> We will not do monitoring. Instead we will visit districts annually for an annual "evaluation" visit, where we will include technical assistance.
>
> We will do a "program review" instead of a monitoring visit. This review will be a technical assistance activity that will help districts solve any problems of compliance.
>
> We will not call it monitoring--that implies checking up on LEAs. We will only check the minimum areas that are required by law. In other areas, we will assist districts to develop more effective programs by providing more help on "sufficient size, scope, and quality" and on needs assessments than in the past.

More than one-half of the sample of states was strongly committed to the idea of monitoring under Chapter 1. These states tended to report past effort in developing monitoring processes that work, they may have expended efforts to involve parents in the process, or they may have utilized other state or local resources to conduct monitoring. Some of those coordinators--especially those who were able to report continuation plans that were consistent with (even if not identical to) their past efforts--spoke out strongly in favor of an important role for monitoring. Sample comments of these coordinators include:

> The SEA is responsible for monitoring. State regulations even require it. We have invested a lot of dollars in our review process and have refined it, and we plan to continue using it.
>
> Monitoring is an important role of the state.
>
> We want to help districts solve any problems of compliance.

> We will monitor districts to help protect them in case of audits.
>
> Monitoring is part of the state leadership role; the districts will expect it.
>
> We have always monitored; it has great value for program quality and compliance. We will continue to monitor as before.
>
> Monitoring is important for compliance and assisting LEAs to develop more effective programs.
>
> Monitoring is a state responsibility to ensure that funds are spent within the intent of the law. It also leads to program improvement.
>
> Monitoring is necessary to ensure compliance with federal rules and the approved project application. It is also the main vehicle for providing technical assistance.

In some cases, however, states that had been extremely active in monitoring under Title I were forced--by fewer dollars and fewer staff--to plan to do less monitoring in the future. While they were all very upset about this turn of events, they tended to deal with their frustration in different ways. Four states, for example, reported plans to do less monitoring to all districts. One planned to require that all of its districts utilize self assessments on an annual basis in lieu of annual monitoring by the state. In three cases, states planned to focus their monitoring on a subset of their districts--whether selected by allocations or by a history of noncompliance or on the basis of poor achievement.

It had been hypothesized that states that really wanted to do more monitoring might discover more creative monitoring procedures other than onsite visits to help them monitor under Chapter 1 to the extent that they would like. One such alternative, which was in fact mentioned, involved more self assessments by districts. Even though seven states in the sample had districts monitor themselves in the past, none of these mentioned relying on this alternative more in the future. Greater reliance on "paper" monitoring was considered by one state but rejected, because it was not felt to be a valid indicator of compliance. Thus, states at this early stage of planning had not considered any different alternatives to monitoring onsite. Hence, they were forced to consider compromises of fewer activities or fewer districts.

It is significant that the coordinators who reported changes to their monitoring continuation plans also tended to report problems. Lack of staff and fewer dollar resources were the only problems mentioned. One coordinator commented:

> Carrying out the actual monitoring activities will not be a problem; what will be frustrating is that we won't be able to do as much as in the past since we will have fewer staff available for conducting monitoring visits."

The states in this sample tended to believe that monitoring was an important function, despite the desires by some to include monitoring activities as part of evaluation or technical assistance. The major challenge for these states under Chapter 1 will be conducting monitoring-like activities with fewer staff and fewer administrative resources.

Monitoring and Enforcement Plan

The monitoring and enforcement plan (MEP) was intended by Congress to help states focus on their monitoring and enforcement activities. The plan was to include a program of regular visits and a description of states' monitoring procedures that was to cover a span of three years. Also to be included were procedures for resolving audits and resolving complaints and specification of plans for ensuring equitable services to children enrolled in private schools. According to the final regulations published in 1981, states

> ...shall submit to the Secretary amendments to an MEP whenever the SEA has substantially changed a policy or procedure that is described in that MEP.

Copies of the MEP were also to be available, free of charge upon request, to any district or Title I advisory council.

Implementation

At the time when states were preparing their MEPs, much confusion existed as to the purpose of the document and its use by ED. It was not until the FY 1980 Title I allocations were delayed during Summer 1979 for some states until their MEPs were submitted to and approved by ED that state Title I coordinators fully realized the significance of this document--that it was considered to be the state application. Because of this finding, some states apparently submitted their documents in a much hurried manner without devoting much time to detailed considerations of its content.

Because many states were not certain about how to interpret the requirements to be included in the MEP, ED disseminated a memorandum outlining the major sections of the MEP, including seven statements that were to appear in the different sections. This memo apparently reached some states too late--after they had already struggled with the preparation of the MEP, but, for others, it was applauded. It is not surprising that many of the MEPs produced looked exactly alike--they tended to follow the outline provided by ED.

Given the knowledge that some of the MEPs were developed under less than ideal circumstances, state Title I coordinators were asked during the interviews conducted by this study about the procedures included in the MEP and how their actual monitoring practices might differ from them. Almost all (N=40) of the state Title I coordinators indicated that the procedures outlined in their MEPs are the ones used for monitoring and enforcement. Only seven coordinators indicated that procedures other than in the state MEP were being used in monitoring. Usually the discrepancies between practices reported on the MEP and actual ones were due to using a newly developed or modified instrument (N=3), to monitoring less frequently than originally planned (N=3), or to not expanding into program compliance auditing as was planned (N=3).

Almost all of the coordinators (N=40) also indicated that they are following the program of regular visits outlined in their MEP. However, these are not necessarily the same ones who indicated that all procedures outlined in the MEP are being used for monitoring and enforcement. Only 35 coordinators consistently said that they are following the procedures outlined and that they are adhering to their plan of regular monitoring visits.

While a sizable number of the coordinators (N=25) said that their state office had used an MEP or a similar plan prior to 1978, and most were following the procedures outlined in their MEPs, more states interviewed said the MEP has not reduced audit exceptions (N=21) than said the MEP has reduced audit exceptions (N=13).

Twenty-seven Title I coordinators answered the question "Does the MEP serve any other important functions (i.e., than reducing audit exceptions)?" in the affirmative. Positive comments regarding important functions of the MEP included such things as the MEP "forces the SEA to formalize their monitoring plan," and it is "good for reaching closure with ED on their expectations." Most of the eight negative comments about the MEP were general and to the effect that the MEP just does not serve any important function.

Problems

Over one-half of the Title I coordinators interviewed stated that the requirement for an MEP has created problems for them (N=24). The problems reported centered on the time-consuming aspects of preparing, negotiating, resubmitting, and amending the original MEP (N=9). Some coordinators felt preparing the MEP was busy work or an unnecessary burden or that there were inadequate resources at the state level to meet the requirements (N=7). Several Title I coordinators reported problems specific to the area of program compliance audits (N=5).

One theme that underscored many of the discussion problems was the lack of information about the MEP available at the time when it was being prepared. Lack of knowledge about the fact that Title I funds would be withheld until the MEP was approved to lack of knowledge about just how "independent" an auditor had to be created much frustration on the part of coordinators who were trying their best to develop these monitoring and enforcement documents. Sarcastic comments made by the coordinators suggested that different answers to the questions dealing with compliance audits and independence of auditors were given simultaneously by different ED Title I personnel.

Resentment was expressed by several coordinators as they believed that the MEP requirement was introduced in the legislation to force a small number of very influential states to conduct regular monitoring visits to their districts. These respondents felt that "most" states were already monitoring their districts, and these states were not the ones that needed an MEP-like plan. Thus, the majority of states had to "suffer for the sins of a few."

One problem encountered by states with the MEP was a long time in coming. Apparently, during the year following its submission, the Title I Program Review Teams began their monitoring visits to states during which they compared actual procedures with the plans and procedures outlined in the MEP. As a result of these visits, a number of states were told to submit an amendment to their MEPs since their actual practices differed from those outlined in the MEP. A frequent reason for submission of an amendment is that states were unable to meet the frequency of their monitoring visits as specified in their MEP.

These citations served to provide a second jolt to states concerning the importance of the MEPs. Since several coordinators had felt initially that the MEP was submitted to ED primarily as simply something they had to do to obtain their Title I dollars, they were surprised to discover that ED Title I personnel took the MEP so seriously. Thus, additional time and effort was spent amending the MEP, which several coordinators felt was problematic.

While the Title I regulations contained a provision that required states to amend their MEPs if their actual practices differed from those included in the MEP, these regulations were not made final until 1981--long after the first amendments were requested.

Preference for Models

A majority of those interviewed (N=23) said it would not be useful to have a standardized or model MEP format. Those who did not feel a standardized or model MEP form would be helpful simply said it is not necessary (N=7) or it would not allow for individual differences or flexibility (N=8).

Of those who felt some kind of model might be useful if the MEP were renegotiated in three years, they suggested having some type of guideline (N=3), a checklist (N=1), or an outline of the format (N=1).

However, as the data collection continued, and when it became apparent that monitoriong may no longer be required, this question was felt to be irrelevant by many of the respondents.

Continuation Plans

Many of the Title I coordinators (N=31) said they would include an MEP-like plan as part of their program management, even if it were not required by law. However, few indicated they would continue to develop an MEP exactly as in the past. Instead, the coordinators said they would use a less formalized system to ensure compliance and to provide technical assistance, which may or may not exist as a formally written plan.

Since so many negative feelings were tied to the MEP, it was not surprising that so few coordinators indicated a desire to continue using the document that they had initially developed. However, the negative feelings observed were not directed toward monitoring or enforcement in general, only toward the MEP itself.

Summary

While the idea of an MEP may have appeared conceptually sound to its initiators, implementation of the idea appears to have been a failure. The differing importance placed on the document by ED and states and the lack of timely and consistent assistance to states on how to develop the MEPs appeared to negate much positive benefit derived from the MEP. The states that reported using a monitoring plan similar to the MEP prior to the MEP mandate tended to report that they will continue to use a similar plan in the future. These states seemed to feel that they suffered through a lot of unneeded paperwork, effort, and difficulties without feeling that much good came of it.

Monitoring: A District Perspective

A sample of 60 districts was queried about their states' monitoring activities to provide an indepth look at this process from a district viewpoint. All 98 districts were asked about key features of the process that they liked or did not like.

The local Title I coordinators indicated that the person(s) who come to conduct monitoring visits were primarily individual Title I consultants from either a regional office or from the central office staff (N=34, 59.6 percent). Twenty coordinators (35.1 percent) indicated that they were monitored by teams, and three (5.3 percent) mentioned some other arrangement.

The frequency with which LEAs were monitored was compared with that reported by their states. This relationship is shown in Table 35.

Table 35

Reports of Monitoring Frequency by Districts and their States

Monitoring Frequency Reported by Districts	Monitoring Frequency Reported by States: Annual	Every 2 Years	Every 3 Years	Depends on LEA Size
Annual	19	0	11	8
Twice per year	0	0	1	4
Three times per year	1	0	0	1
Every 2 years	1	0	0	2
Every 3 years	0	0	3	4
Other/Don't Know	2	0	1	2

As apparent from the table, there is relatively close agreement between district perceptions of how often they are monitored and reports of monitoring frequency made by their states. The largest difference was between the 11 LEAs that reported annual monitoring visits and their states that reported less frequent monitoring. No particular reasons for this discrepancy were observed.

The majority of districts believed that monitoring led to improvements in program quality (N=46, 80.7 percent); a lesser number felt that monitoring led to changes in their program management (N=38, 66.7 percent). The districts reporting that monitoring led to changes in their program management tended to come from states that were active in the area of monitoring for quality of service. Surprisingly, the same relationship did not hold strongly for districts reporting that monitoring led to improvements in program quality as shown on Table 36.

Table 36

Relationship between District Monitoring Attitudes and State Monitoring Activities

	District Attitudes			
	Monitoring Leads to Management Changes		Monitoring Leads to Program Improvement	
Number of Quality Monitoring Activities Reported by States	No	Yes	No	Yes
Low	10	10	2	22
High	9	26	8	25

All districts were asked what they liked best about the monitoring process, and their responses are categorized as shown in Table 37.

Table 37

What LEAs Liked Best About the Monitoring Process

Response	Number of Districts
• Constructive Criticism, Suggestions, Reinforcement of Practices by SEA--A Good Management Tool	40
- SEA goes over problems on the spot and helps LEA make necessary changes - LEA staff included on state monitoring staff offers helpful suggestions - SEA offers worthwhile suggestions to improve programs - SEA can put pressure on LEA administrators to make needed changes - Comments made by SEA staff lead to improvements in program quality - Having an outsider review the program allows LEAs to review their programs objectively	

Table 37 (continued)

Response	Number of Districts
• Monitoring Keeps LEAs Honest/On Their Toes/ Legal and in Compliance - Knowledge that LEAs will be monitored keeps them on their toes and in compliance	28
• Monitoring Allows LEAs to Show Off Program to Outsiders - Opportunity to show off the good things LEA is doing - LEA can "strut its stuff" - SEA can increase knowledge of the LEA - Monitoring leads to improved SEA/LEA relations	6
• Monitoring Enables Provision of Technical Assistance - Major means of getting ideas of what other LEAs are doing - Good way for LEAs to find out "what is going on in Washington" and "what may come done the pike from Washington" - Opportunites to "pick the brains" of SEA consultants, especially if content specialists are used	7
• General Positive Attitudes toward SEA/ Monitoring Process - SEA consultants are fair, thorough, good monitors - SEA monitors are very personal, advocates not adversaries, humans not tyrants - Use of teams is valued - Provision of a checklist in advance of the visit is helpful	18
• Nothing	3

It is apparent that LEAs also have a mixture of attitudes about monitoring--whether monitoring is to help improve their programs or primarily to help them become in compliance with the law. These same attitudes are mirrored by their states as well.

This mixture of district attitudes is further illustrated by their comments as to what they liked least about the monitoring process. These answers are categorized as shown in Table 38.

Table 38

What LEAs Liked Least About the Monitoring Process

Response	Number of Districts
• Nothing	17
• Monitoring is a Burden/Too Time Consuming	23
- Timing of visits is always bad - Too much time is needed to prepare for the visits, and often the information compiled is never reviewed by the monitors - Scheduling of many monitors into schools is difficult - The process is too time consuming, contains too much busy work	
• Monitoring Causes High Levels of Anxiety on Part of LEAs	12
- Title I teachers get so nervous and uptight about the visit - Title I coordinators feel the pressure--if violations are found, they don't want the rest of the district to suffer from their mistakes - Monitoring makes all LEA staff nervous - Some SEA monitors deliberately intimidate Title I teachers - Creates too much uncertainty--LEAs do not know what to expect	
• Problems With Monitoring Process/SEA Staff	20
- Not enough technical assistance provided - One day is too short to be of help to LEA - Some SEA staff have preconceived notions about what they will find - Some SEA monitors ask irrelevant questions - A team of 15 SEA consultants is overkill - Not following an SEA "recommendation" today will mean a "citation" tomorrow - Monitoring is not frequent enough - Monitoring is too frequent	

Table 38 (continued

Response	Number of Districts
- Regional office monitors only do "paper monitoring since they have no specialized content backgrounds	
- Some SEA monitors not well trained, competent, inexperienced	
• Monitoring as Implemented May Not Lead to Improved Program Quality	10
- SEA does not make helpful/constructive comments	
- Not enough focus on the whole project--only on whether particular requirements are met	
- Follow through by SEA is minimal--friendships get in the way of making constructive suggestions to improve program	
- Monitoring does not benefit the students	
- SEA forces LEAs to change program practices, even if evaluation data show no problems	
- SEA monitors only look for noncompliance--they do not help LEAs to improve their programs	
• General Negative Reactions Toward Process	3

One reaction shared by districts that might surprise their state Title I offices is that monitoring led to high levels of anxiety on the part of 12 LEAs, in which incidentally six were located in three states. Much of the anxiety stemmed from the unpredictability caused by having inexperienced or less competent SEA staff serve as monitors. In other cases, however, experienced monitors apparently deliberately intimidated some districts to make themselves appear to have more oversight authority than they did. Because these monitors appeared to have such complete control over whether districts received positive or negative reports of the visit, it is not surprising that some LEA staff were anxious about the process. In a few cases, more vocal LEA staff requested that the state Title I coordinator change their monitor(s), because they believed that the monitors assigned to them were not fair or not doing a good job.

Despite some of these problems, most districts tended to rate their states as being extremely helpful (N=61, 66.3 percent) or slightly helpful (N=21, 22.8 percent) to them during the monitoring process. Eight districts (8.7 percent) were neutral, and two districts (2.2 percent) felt that their states had actually been a hindrance in this process.

Districts' views of how helpful their states were in the area of monitoring are highly correlated with their states' monitoring orientation as shown in Table 39.

Table 39

Helpfulness of States as a Function of their Monitoring Attitudes

District Perceptions of Helpfulness of State	State Monitoring Attitude Quality	Both	Compliance
Hindered	0	0	2
Slightly Helpful	1	14	6
Helpful	16	32	13
Neither	1	4	3

It is readily apparent from this table that the quality-oriented states, or states with both a quality and compliance orientation, appear to be viewed by their districts as much more helpful than those states with a more compliance orientation.

The presence of state regional offices was also associated with more helpful responses by their districts as shown in Table 40.

Table 40

Helpfulness of States as a Function of Regional Offices

District Perceptions of Helpfulness of State	Presence of State Regional Offices No	Yes
Hindered	0	0
Slightly Helpful	15	6
Helpful	34	27
Neither	6	2

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Districts were asked how their states could improve their monitoring process. While 20 coordinators had no suggestions, 72 coordinators did. The most frequent suggestions are:

- more frequent or longer visits (N=18),
- fewer visits (N=6),
- concentrate more on program quality (N-6),
- provide information in advance of the visit as to content to be covered (N=2), and
- eliminate monitoring altogether (N=1).

Forty coordinators made numerous other comments that spanned many areas, primarily involving SEA activities and staffing, such as

- increase competence of monitors;
- tie evaluation, monitoring, and application approval together to make a more integrated program;
- use the statewide computer to keep a permanent record of monitoring activities for each LEA;
- have SEA monitors be more consistent in their criticisms; and
- have SEA monitoring reports appear in a more timely manner so as to be useful to LEAs.

At the end of the monitoring section of the interview, districts were asked, if there were no requirement in the law for the state to monitor your Title I program, do you think it would be a good idea for the state to do so? Only 3 of the 63 coordinators (4.8 percent) answered negatively--all of the remaining LEAs felt strongly that monitoring should continue. Since the monitoring items generated quite a few strong negative comments on the part of some LEA coordinators, it is interesting to note that some of these coordinators were particularly vocal advocates for continuation of the monitoring process.

TECHNICAL ASSISTANCE AND DISSEMINATION

TECHNICAL ASSISTANCE AND DISSEMINATION

Chapter Highlights

Prior to 1978, the Title I statute only obligated states to provide technical assistance to LEAs for evaluation purposes. The U.S. Department of Education also funded ten Title I Evaluation Technical Assistance Centers (TACs) in 1976 to help states implement the evaluation provisions. The 1978 Title I statute clarified and expanded the state role in providing technical assistance and disseminating information. The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the technical assistance and dissemination provisions included in the 1978 law and 1981 regulations (and the impact of the Technical Assistance Centers):

- To what extent did these provisions affect states' administrative practices?
- To what extent did states change their practices as a result of the Title I law?
- What problems did states encounter in carrying out their technical assistance and dissemination efforts?
- Did the provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to provide technical assistance if this activity were not expressly required by law?

Technical assistance has a strong dual quality and compliance component: States used technical assistance to help their districts implement legal programs, and they also engaged in activities to help their districts improve their programs. Technical assistance was also highly interrelated with all of the other management responsibilities states have. For example, technical assistance was combined as part of the monitoring onsite visit; Title I staff provide assistance to their districts to complete applications, conduct evaluations, and involve parents.

The study's major findings are:

- The personalized methods of assistance--meetings with LEAs, conducting small-group workshops--consistently correlate with a "quality" management orientation; while use of less personalized services--statewide conferences, for example--correlate with more of a "compliance" orientation.
- A greater emphasis placed on providing technical assistance in the areas of evaluation and parent involvement as

a result of the 1978 Title I law was associated with compliance attitudes. These states had not been active in these areas prior to 1978; hence their recent activities in these areas were conducted, in part, to become in compliance with the law.

- States that reported using their Technical Assistance Centers to help them integrate evaluation with program design were very active in evaluation, had a quality orientation that was expressed in monitoring and evaluation, and relied on personalized technical assistance methods--the profile of a "quality" management.

- Almost all states felt their Technical Assistance Centers were extremely helpful. However, they were divided as to whether they wanted the Technical Assistance Centers to retain their evaluation focus or to broaden to include curriculum or other areas. A few states felt that their Technical Assistance Centers had outlived their usefulness and should be terminated, since their TACs were associated only with implementation of the evaluation models.

Almost all states planned to continue providing technical assistance and dissemination under Chapter 1. However, fewer administrative funds and lack of a legal mandate may curtail a high level of activity in this area. While some states planned to scale down their present efforts or to rely more on the use of large-scale workshops, others were looking for effective--but low cost--methods of providing assistance. Since the personalized services are consistently associated with quality management activities, states may look to the U.S. Department of Education, their Technical Assistance Centers, or elsewhere for assistance in this area.

Districts tended to corroborate their states' reports of technical assistance provided. The more active providers of assistance apparently utilized more personalized services, while the less active states relied more on large-scale, more impersonalized, assistance methods.

Generally, districts were quite satisfied with the help they received from their states, and they wanted the assistance to continue even if states were not required by law to provide any.

Introduction

Prior to 1978, the Title I statute only obligated states to provide technical assistance to LEAs for evaluation purposes. The reference to the provision was contained in Section 143(b) of Public Law 93-380, under payments for state administration: "The Commissioner is authorized to pay to each State amounts equal to the amounts expended by it for the proper and efficient performance of its duties under this title (including technical assistance for the measurements and evaluations required" by law. A similar statement was also included in the 1976 Regulations (Section 116.4).

According to Gaffney, Thomas, and Silverstein (1977), who did a thorough review for NIE of the legislative history of the technical assistance responsibility given to states prior to passage of the 1978 law, Congress apparently did not intend that technical assistance should be limited to the area of evaluation. From a review of Congressional reports and informal USOE (now ED) memoranda and handbooks, these authors found evidence for a broader interpretation of technical assistance: States were to help districts plan, develop, and evaluate their programs; to provide assistance to districts during the monitoring onsite visits; to provide assistance to parent advisory council members to improve council operations; and to provide case studies of exemplary projects to districts to help them design Title I projects (which USOE disseminated to states).

While districts were charged by law (Section 141(a)(10) of P.L. 93-380) with adopting effective procedures for disseminating significant information derived from educational research, demonstration, and similar projects, no comparable provision existed to require states to act similarly. The only authority was implied from GEPA in which states were required to provide whatever methods of administration as may be necessary for proper and efficient administration (Gaffney, Thomas, & Silverstein, 1977).

The NIE study concluded that states' technical assistance and dissemination efforts varied widely in quality and comprehensiveness. Despite the apparent emphasis of the law and regulations on providing technical assistance in the area of evaluation, some states concentrated much of their assistance in other areas, parent involvement for example.

One point that was mentioned briefly by these authors was the emerging dual purpose for technical assistance--the provision of assistance to districts to help them come into compliance with the law vs. the provision of assistance to districts to help them improve the quality of their programs. As noted by Goettel, Kaplan, and Orland (1977), "all states feel comfortable in rendering assistance to address funds allocation questions. Some states are decidedly less comfortable, however, in giving technical assistance in program development areas" (p. 78).

Where states should place their staff and dollar resources--on compliance or quality assistance--was an issue addressed by Congress during the 1978 Title I reauthorization hearings. The House Committee on Education and Labor in its report on the Education Amendments of 1978 concluded:

> Different needs may dictate different forms of and approaches to technical assistance provided by State educational agencies. The Committee's intent is that State educational agencies provide a program of comprehensive technical assistance. The Committee believes that a broader, more balanced approach to technical assistance will help improve program quality and compliance with the applicable provisions of this title and the regulations. (p. 44)

Section 166 of the Education Amendments of 1978 clarified and expanded the state role in providing technical assistance and disseminating information. The recommendations of the NIE study were closely followed in drafting this piece of legislation. The 1978 Title I law broadened the interpretation of technical assistance. States were specifically required to provide assistance to these districts in the following areas:

- management procedures, including preparation of applications;
- planning;
- development;
- project implementation;
- evaluation; and
- any other assistance as needed by LEAs and other state agencies administering Title I programs.

States were also required to adopt effective procedures for disseminating information to their districts in the following areas:

- relevant research findings;
- information about successful compensatory education projects;
- information about federal and state programs that provide health, social, and nutrition services to Title Ieligible students; and
- any other information that will help districts with planning, developing, implementing, or evaluating their Title I programs.

The final 1981 Title I regulations included similar statements in Sections 200.170 and 200.171.

Ten regional Technical Assistance Centers (TACs) were funded in 1976 by ED in response to a mandate in Section 151 in P.L. 93-380 to assist states with their provision of technical assistance, as well as to implement the Title I Evaluation and Reporting System (TIERS) and to build state and local capacity in the area of evaluation. The early years of TAC operation focused primarily on implementing the evaluation system; once the system was in place, TACs began to assist states with how to use evaluation data to improve programs. Since a prime focus of the TACs is to build evaluation capacity, ED specified in the TAC contracts that TACs were to serve only in a supportive capacity to states; they were not to take over any tasks from states that they were specifically required by law to do (e.g., collect and analyze evaluation data).

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the technical assistance and dissemination provisions included in the 1978 law and 1981 regulations (and the impact of the Technical Assistance Centers):

- To what extent did these provisions affect states' administrative practices?
- To what extent did states change their practices as a result of the Title I law?
- What problems did states encounter in carrying out their technical assistance and dissemination efforts?
- Did the provisions stimulate states to develop exemplary practices or materials in this area?
- To what extent would states anticipate continuing to provide technical assistance if this activity were not expressly required by law?

Title I projects operated under the 1978 Title I statute and 1981 regulations for only a short time, when the Education Consolidation and Improvement Act was passed (August 1981). Chapter 1 of ECIA retained the intent of the Title I program, but lessened many of the requirements.

One of the requirements that is not included in Chapter 1 is the requirement for states to provide technical assistance. Thus, the last part of the technical assistance and dissemination section of the interview, namely the theoretical question of states' interactions to provide such assistance under a less prescriptive law, took on added significance.

This chapter summarizes the findings of the State Management Practices Study to the five questions listed above. Also included in this discussion are states' preliminary views of the impact of Chapter 1 on their future technical assistance and dissemination activities. The chapter concludes with opinions of a sample of districts to their states' technical assistance and dissemination efforts.

Implementation

The technical assistance and dissemination provision was viewed as being of substantial importance in meeting the intent of the Title I law by most of the Title I coordinators (N = 37). Only one coordinator felt the provision was of little or no importance. This coordinator felt that a technical assistance provision was not needed, because these activities were conducted as part of monitoring--to which he gave a substantial importance rating.

Considerable staff time, approximately 20 percent, was spent on providing technical assistance and disseminating information to districts. The median amounts of time spent by states conducting these activities as a function of importance states placed on this provision is shown in Table 1.

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Table 1

Percentage of Time Spent on Technical Assistance and Dissemination as a Function of Their Importance[a]

Rating	Median Percent of Time Spent	Low	High	N
Little or no importance	10.0	--	--	1
Moderate importance	16.5	12.0	44.0	9
Substantial importance	21.0	5.0	42.8	37
Group Median	20.0			

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[a] Data from three states are missing.

As apparent from this table, the amount of time spent did not differ significantly as a function of its importance rating. It is also evident that several states indicated spending almost one-half of all staff time in the provision of technical assistance. As noted in the chapter on monitoring, separation of time spent monitoring from time spent in providing assistance to districts was difficult. While some states attributed no staff time to monitoring, they were the ones that reported much larger amounts of time spent in technical assistance.

The technical assistance activities undertaken by states will be discussed in the first section of this chapter. The discussion will center around the following questions:

- How do states provide technical assistance?
- To what extent is technical assistance related to activities provided in other areas of responsibility?
- To what extent is technical assistance coordinated across units in the state agency?
- To what extent is technical assistance coordinated with monitoring?

How do States Provide Technical Assistance?

All of the ways state Title I coordinators said that they provide technical assistance to their districts are shown in Table 2.

Table 2

Ways in which Technical Assistance is Provided

Method	Number of States
Meetings with LEAs (at LEA or SEA)	35
Telephone consultations	23
Workshops	35
Correspondence/mailings/memos	22
Newsletters	7
TAC	11
Monitoring onsite visits	15
Statewide regional meetings	20
Statewide conferences	16
Use of a state parent group	1
Use of a contractor to train PACs	3
Responses to LEAs for specific help	6
Arrange visits to exemplary programs	1
State Title I handbook/policy manual	9
Use of regional offices to provide TA	5

The interrelationships among these methods are shown in Table 3. From the pattern of interrelationships shown, several trends are evident:

- Certain pairings of activities correlate highly, particularly use of correspondence and newsletters, and use of telephone conversations and meetings with the LEAs. The former pairing consists of two ways of providing written technical assistance, while the latter is oral or face-to-face. The pairs of variables are not correlated with each other, however.

- There is a high negative relationship between use of telephone conversations and statewide meetings. Use of statewide regional meetings also correlates negatively with responses to LEAs for specific help. This contrasts relatively "distant" and impersonal methods (statewide meetings) with more personalized and direct methods.

It was recognized in the introduction to this chapter that states historically have been less comfortable with their role of providing assistance to districts to help them improve programs than with their role of helping districts implement legal programs. Despite this fact, almost all states provided technical assistance to their districts on the great majority of LEA requirements as shown in Table 4.

Table 3

Tetrachoric Correlations among Kinds of Technical Assistance Activities[a]

Activity	Meetings with LEAs	Telephone Conversations	Workshops	Correspondence	Newsletters	TAC	Monitoring Trips	Statewide Regional Meetings	Statewide Meetings
Meetings with LEAs									
Telephone Conversations	.38								
Workshops	.17	.08							
Correspondence/Mailings/Memos	.04	.57	-.11						
Newsletters	.00	-.30	.29	-.52					
Work with Technical Assistance Center	.03	-.03	.24	-.01	.58				
Monitoring Onsite Visits	-.12	.29	.23	.32	.21	.30			
Statewide Regional Meetings	.11	-.05	-.19	.01	.26	.26	.13		
Statewide Meetings	.27	-.49	-.23	-.02	.17	-.11	-.15	.35	
Responses to LEAs for Help	-.08	.30	-.08	.33	-.18	-.12	.14	-.41	-.29

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[a] Correlations of approximately .4 or greater are statistically significant at the p = .05 level.

Table 4

LEA Requirements on which Technical Assistance is Provided

LEA Requirement	Number of States Reporting
Funds Allocation	
a. Maintenance of effort-126(a)	39
b. Excess costs-126(b)	40
c. Supplement not supplant-126(c)&(d)	45
d. Comparability-126(e)	46
e. Exclusions from excess costs and comparability-131	32
f. Limited exemption to supplement not supplant-132	29
Targeting and Eligibility	
a. Designating school attendance areas-122	43
b. Children to be served-123	45
c. Private school participation-130	43
d. Schoolwide projects-133	20
Program Design and Planning-124,129,134	
a. Requirements for design and implementation of programs-124	
1. Purpose of program-124(a)	40
2. Assessment of educ. need-124(b)	45
3. Planning-124(c)	42
4. Sufficient, size, scope, and quality-124(d)	41
5. Expenditures related to ranking of project areas & schools-124(e)	37
6. Coordination with other programs-124(f)	42
7. Information dissemination-124(h)	37
8. Teacher & school board participation-124(i)	38
9. Training of education aides124(j)	43
10. Control of funds-124(m)	41
11. Construction-124(n)	28
12. Jointly operated programs-124(o)	36
13. Accountability-127	38
14. Complaint resolution-128	42
15. Individualized plans-129	42
16. Noninstructional duties-134	41
Evaluation	
a. Evaluation-124(g)	46
b. Sustaining gains-124(k)	40
Parent Involvement	
a. Parent involvement-124(j)	47
b. Parent Advisory Councils-125	44

It does not appear from these data that states as a rule provided less assistance to their districts on program areas than on the funds allocation or targeting areas. The more significant variable in deciding which areas to emphasize was perceived to be district needs. States often did not provide assistance in areas that they felt were of little or no concern to districts, such as construction, the exclusions from excess costs and comparability, or the limited exemption to supplement not supplant.

One area that was treated with care by states was schoolwide projects. States that had schoolwide projects tended to provide assistance to their districts on issues related to their implementation. States with no schoolwide projects had mixed reactions when they were asked if they provided technical assistance to districts in this area. Some states indicated that they covered schoolwide projects in their technical assistance workshops or written materials as simply another program option available to districts if districts wanted to select it. Other states, however, especially ones that felt they had districts that were eligible to have schoolwide projects, had spent considerable time studying the legal provision for schoolwide projects only to conclude that their districts could not meet all of the necessary requirements for implementation.[1] Because these states knew that their districts would want to attempt implementation and would therefore be frustrated to discover they were unable to implement schoolwide projects, they made the conscious decision not to inform their districts generally of the option.

If districts learned of the option by reading the law on their own and requested information from their states on schoolwide projects, the states indicated that they supplied whatever assistance was needed in this area.[2]

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[1] The requirement in Section 133 on schoolwide projects that apparently gave the districts most trouble was (b)(7)(B), which specified that LEAs were to make "special supplementary State and local funds available for the children" in the schoolwide projects "in amounts which, per child served who is not educationally deprived, equal or exceed the amount of Federal funds provided ... which, per educationally deprived child served, are made available for children in such schools." Districts, many of which were already strapped for funds, were unable to come up with the additional funds to pay the per-pupil costs for as many as 25 percent of a school's children.

[2] One Title I coordinator related a story about providing technical assistance to a school district interested in implementing schoolwide projects. Although the state felt that the district was unable to provide the necessary supplementary funds, and hence the district should not consider implementation further, the district insisted on trying schoolwide projects anyway. After many months of intensive state help, including hours on the telephone and onsite, the project folded because the district was, in fact, unable to come up with the amount of supplementary funds needed for implementation. State and district both felt embittered over this episode. The state coordinator regretted that a provision such as this one was included in the law. He felt that all districts did not have an equal chance to implement the law, and that it was expected that states were to provide assistance to districts on it.

Since the *topics* on which states provided assistance did not appear to reflect avoidance of "program" areas in favor of "compliance" areas, the question was raised as to whether the *ways* in which states provided assistance to their districts (as shown in Table 2) might differ depending on their attitudes toward program quality and compliance.

The following section examines these relationships between technical assistance methods and attitudes and activities in other areas of responsibility.

Interrelationship of Technical Assistance with Attitudes and Activities in Other Areas

In the chapter on Monitoring, it was noted that quality-oriented states tended to see monitoring as more closely related to technical assistance and associated efforts to improve program quality than other states. They tended to engage in "extra" monitoring activities to monitor for quality of service. This extra effort was clearly difficult to do and sometimes involved the use of outside consultants and content experts from other units with the state agency. Thus, it is reasonable to inquire as to whether the methods of providing technical assistance listed in Table 2 correlate with these activities.

Table 5 presents the association of monitoring attitudes with the major technical assistance variables. This table indicates that three of the methods--meeting with LEAs, telephone conversations, and correspondence--consistently correlates with quality-oriented attitudes; and one method in particular--use of statewide conferences--correlates negatively with these variables.

Table 5

Relationship of Monitoring Attitude to Technical Assistance Activities

	Technical Assistance Activity							
Monitoring Attitude	Meet with LEAs		Telephone Conversations		Correspondence		Statewide Conferences	
	No	Yes	No	Yes	No	Yes	No	Yes
Quality	0	6	2	4	3	3	5	1
Both	7	20	15	12	13	14	18	9
Compliance	6	8	7	7	10	4	9	5

Of all the methods of providing technical assistance presented in Table 2, meeting with LEAs is, perhaps, the "purest" so-called "quality-related" way of providing technical assistance. As seen in Table 5, all six quality-oriented states said they do this, while the compliance-oriented states are split nearly equally. In addition, this method of providing technical assistance is also related to the number of quality monitoring activities as shown in Table 6.

Table 6

Relationship between Number of Quality Monitoring Activities and a Technical Assistance Activity

Number of Quality Monitoring Activities	Technical Assistance: Meet with LEAs No	 Yes
0 - 1	10	16
2 - 4	4	19

States that meet with LEAs are much more likely to have said that monitoring serves as a lead-in to technical assistance and that monitoring leads to improvements in program quality as shown in Table 7.

Table 7

Relationships between several Technical Assistance Variables

Meet with LEAs	Lead-in to Technical Assistance No	 Yes	Improves Program Quality No	 Yes
No	7	7	10	4
Yes	8	27	14	21

Since the close psychological distance between monitoring and technical assistance is characteristic of the archetype quality-oriented state, the relationships shown in Table 7 are key features of this configuration of activities and attitudes.

With respect to so-called "compliance" oriented attitudes and activities, relationships between two monitoring variables are of interest. First, states that meet with LEAs are clearly not those that said the purpose of monitoring was "compliance only" (see Table 8).

Table 8

Relationship between a Technical Assistance Activity and a Monitoring Attitude

Technical Assistance: Meet with LEAs	Monitoring is for Compliance Only No	Monitoring is for Compliance Only Yes
No	8	6
Yes	31	4

Second, almost all of the states that said that monitoring is used for accountability also engaged in this technical assistance activity as shown in Table 9.

Table 9

Relationship between a Technical Assistance Activity and a Monitoring Attitude

Meet with LEAs	Monitoring for Accountability No	Monitoring for Accountability Yes
No	13	1
Yes	23	12

Those states reporting use of meeting with LEAs as a method of technical assistance clearly tends to be the quality-oriented monitoring states as measured by both attitude and activity measures. They view monitoring and technical assistance as being closely related, they do not monitor for compliance only, but nearly all the states that use monitoring for accountability report use of this method of providing technical assistance.

Two other technical assistance activities, telephone conversations and written correspondence, also correlate with indicators of quality monitoring attitudes, but the relationships are not as strong. As shown in Table 10, both variables are associated with the use of monitoring to improve program quality.

Table 10

Relationship between Monitoring and Technical Assistance Activities

Monitoring Leads to Improvements in Program Quality	Telephone Conversations		Written Correspondence	
	No	Yes	No	Yes
No	17	7	16	11
Yes	9	16	11	14

It was also observed in the chapter on Monitoring that *attitudes* toward parent involvement, and not simply *whether* parents were involved in monitoring, differentiated quality-oriented states from the others. Thus, it is reasonable to inquire as to whether the methods of providing technical assistance correlate with these attitudes and activities.

Table 11 presents the association of the parent involvement attitude variable with five technical assistance activities. As is indicated by Table 11, the technical assistance activities of telephone conversations and written correspondence are also associated with positive attitudes toward parent involvement. Thus, the states that have a quality monitoring orientation and positive attitudes toward parent involvement tend to report using these three methods of providing technical assistance--meeting with LEAs, telephone conversations, and written correspondence. This group of technical assistance activities emphasizes individualized contact between the SEA and LEA and face-to-face interaction.

Table 11

Relationship of Parent Involvement Attitudes to

Technical Assistance Activities

Parent Involvement Attitudes	Activity: Meet with LEAs		Telephone Conversations		Correspondence		Statewide Regional Meetings		Statewide Conferences	
	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes
Positive toward parent participation and pro-PACs	2	2	0	4	0	4	2	2	4	0
Positive toward parent participation and less pro-PACs	4	20	13	11	15	9	18	6	19	5
Positive toward parent participation and anti-PACs	4	13	10	7	10	7	6	11	6	11
Negative toward parent involvement and anti-PACs	2	0	2	0	2	0	1	1	2	0

The opposite end of this continuum is represented by use of statewide meetings and conferences. As is indicated by Tables 5 and 11, the use of statewide meetings is actually negatively related to a quality orientation in monitoring and attitudes in parent involvement. This negative relationship is also observed with activities in other areas, as shown in Table 12.

Table 12

Relationship of Impersonalized Technical Assistance Activity with Activities in Other Areas

Use of Statewide Conferences	State-level Parent Involvement Activities		Rule Use			Three-year Cycle Use		
	0-2	3-4	None	Minimal	Active	No	Yes, No Paperwork Reduction	Yes, Paperwork Reduction
No	12	10	3	6	13	5	5	12
Yes	22	5	7	11	9	11	6	7

As shown in Table 12, use of statewide conferences is also inversely related to the number of parent involvement activities and the extent of rule use. The use of statewide conferences is also negatively related to success in use of the three-year application approval cycle.

A comparison of both the "personalized" and "impersonalized" types of technical assistance as measured by the use of meetings with LEAs and the use of statewide conferences with evaluation attitudes highlights the differences implied here. These relationships are presented in Table 13.

Table 13

Relationship of Evaluation Attitude to Personalized and Impersonalized Technical Assistance Activities

Evaluation Attitude	Meeting with LEAs No	Meeting with LEAs Yes	Statewide Conferences No	Statewide Conferences Yes
Program Improvement	7	9	7	9
Both	4	19	11	12
Accountability/Compliance	1	6	2	5

As is discussed in the chapter on Evaluation, the states with both program improvement and accountability attitudes are the most active states in the area of evaluation; they are also active monitors for program quality and successful users of the three-year application cycle. Thus, they resemble the "quality"-oriented states referred to here, which rely more on personalized face-to-face technical assistance and less on the more impersonalized services as measured by the use of statewide conferences. The program improvement states are generally less active in both evaluation and monitoring activities and they hold less positive parent involvement attitudes--their profile on the two technical assistance activities is consistent with this inactive pattern.

As is apparent from Tables 12 and 13, users of statewide conferences tend to be less active generally than other states. A quality orientation in monitoring, evaluation, and parent involvement is characterized by higher than average levels of activity, particularly the so-called "extra" activities designed to go beyond compliance or accountability. In the chapter on Application Approval, success in using the three year-cycle was related to a more active, problem-solving management style; here it can be seen that successful users of the three-year cycle states tend not to rely on statewide conferences to provide technical assistance. Users of statewide conferences appear to be less active on several related dimensions.

To summarize, it appears that states that have a quality monitoring orientation, positive attitudes toward parent involvement, and attitudes that evaluation serves both program improvement and accountability purposes, tend to use face-to-face or individualized methods of providing technical assistance. Less active states that have less postive attitudes about parent involvement and do not have a quality monitoring orientation tend to use statewide meetings instead.

Frequent personalized face-to-face interactions with LEAs, however, are likely to be expensive and may require both more staff and resources to implement than would the conduct of infrequent, large statewide conferences. Thus, an alternative explanation for the differentiation of activity levels mentioned previously may be possible. Perhaps the only way states with more limited resources can carry out their technical assistance activities required by law is to rely on large statewide conferences. States with access to larger staffs or more dollars or regional offices may have the resources needed to be able to provide more personalized services to their LEAs. An examination of the use of these two types of technical assistance activities as a function of state characteristics shows the following:

- States that reported use of meeting with LEAs could not be differentiated from those that did not, using any of the allocation, population, or staffing variables. They did, however, report spending more time on technical assistance activities than those states that did not use meeting with LEAs.

- States that used statewide workshops can be differentiated from those that did not: they had larger amounts

> of funds for state administration, more LEAs, more population at each of the last three census counts, and more SMSAs over 25,000. They did not, however, have larger central office staffs, nor did they differ on the amounts of time spent on technical assistance.

The role played by the regional offices was further investigated. It had been expected that regional offices might facilitate face-to-face meetings. The data show, however, that approximately the same proportion of states reporting use and nonuse of meetings with LEAs had regional offices.

Thus, it is not the case that states using more personalized technical assistance have a greater amount of resources, or even smaller numbers of LEAs, than those that do not. In fact, the greater resources are associated with statewide conferences, which have been shown to correlate with lesser amounts of activities. Therefore, the differences in activity levels noted here cannot be explained on the basis of differing state characteristics.

Coordination of Technical Assistance Across Units in the State Agency

Forty-three states said that other units within the state agency were also involved in providing technical assistance to Title I projects. The types of units mentioned by the coordinators are given in Table 14.

Table 14
Types of SEA Units in State Agencies
Involved in Providing Technical Assistance to Title I Projects

Type of Unit	Number of States
Instruction or curriculum unit	28
Testing or evaluation unit	15
Fiscal unit - auditing	11
Special Education Unit	10
Administration/Record Keeping/Accounting	10
Other federal program units (Vocational Education)	5
Another unit involved in Title IV or NDN programs	3
Computer center for data processing	5
Personnel services (Certification, etc.)	3
State Compensatory Education	3
Early childhood unit	2
NIE dissemination project grant	1

Staff from these other units provided a number of different types of services to Title I project staff. Staff from instruction or curriculum units (including specialized subject matter units--reading or math, for example) often reviewed project applications to ensure quality programs and accompanied state Title I staff on their monitoring visits to LEAs to examine the actual program content and to offer suggestions on what instructional methods or practices might improve the quality of the programs. In other cases, the staff from Title I and the state's compensatory education program overlapped to a great degree so that new ideas learned in one program would benefit the other.

It was therefore expected that some of these types of coordination would be correlated with the quality and compliance attitude variables discussed in this chapter. The only activity that exhibits some consistent relationships is coordination with a Special Education unit. This type of coordination is associated with quality monitoring activities and negatively related to a compliance monitoring attitude. All of the other relationships with coordination types are weak or nonexistent.

Coordination of Technical Assistance with Other State Responsibilities

Monitoring

As noted in the discussion on monitoring, the final 1981 Title I regulations were changed to permit, rather than require, states to include technical assistance as part of the onsite monitoring visits. While 43 states reported that they combined their technical assistance activities with monitoring, 33 of them reported actually providing technical assistance as part of the onsite visits. A group of four states indicating that monitoring and technical assistance were kept separate in their states reported that the two functions were actually conducted by separate units in the state agency.

Because a close relationship between monitoring and technical assistance was hypothesized to be due more to a "quality" than a "compliance" orientation, the coordination between the two responsibilities was examined as a function of monitoring activities and attitudes. The results show that none of the four states reporting that different state units conducted monitoring and technical assistance were characterized as having a quality monitoring orientation as was expected.

What was unexpected is the observation that equal proportions of the states labeled as having quality, compliance, or both quality and compliance attitudes indicated that they combined technical assistance with their monitoring onsite visits. A closer look at the individual responses, however, shows very different interpretations of what was meant by this coordination. Consider, as an example, the following comments:

> Technical assistance is the purpose of monitoring.
>
> When onsite, we first do our monitoring for compliance, then we follow it up by providing technical assistance in the areas of weakness.

> One of the most effective ways of monitoring is to correct problems as soon as they are identified--i.e., onsite.
>
> We have monitoring teams visit districts, which include content specialists from other state units whose primary purpose is to provide technical assistance.

A less active point of view was expressed by the following coordinators:

> We provide technical assistance as needed.
>
> If we find a district in violation, we help them while onsite.
>
> Our consultants always write up findings and offer suggestions for corrective action in monitoring reports, which are later sent to the districts.
>
> We handle technical assistance informally before or after the visit.

Thus, while states with differing monitoring attitudes all reported coordination of technical assistance with monitoring onsite visits, it appears that some states were more active in this area than others.

Application Approval and Program Implementation

According to Section 166 of P.L. 95-561, states were required to provide assistance to their local school districts to help them prepare their project applications and provide whatever assistance was needed to help districts plan, implement, evaluate, and manage their programs.

Forty-four states reported that they use technical assistance to help LEAs prepare their applications. This assistance was provided primarily in the form of presubmission conferences or workshops (N = 32) or some other form of individual contact (N = 12) is used. Only one state said that they try to go beyond compliance to help the LEA design a quality program, and two states said that they would help the LEA write the application, if needed.

The use of presubmission conferences to help the LEA prepare the application is, in fact, associated with a compliance-orientation in monitoring. States with compliance attitudes and states that engage in many compliance monitoring activities are more likely to hold presubmission conferences as shown in Table 15.

Table 15

Use of Application Approval Presubmission Conferences as a Function of Monitoring Attitudes and Activities

Use of Presubmission Conferences	Monitoring Attitude			Number of Compliance Monitoring Activities	
	Quality	Both	Compliance	1 - 2	3 - 4
No	2	12	3	13	4
Yes	4	15	11	15	17

These relationships are probably due to the fact that the technical assistance being provided is of a legalistic nature. Reports from several of the coordinators tend to support this view. In the words of one:

> We hold many county/regional meetings around the state to help districts work through their applications. By working through the problems prior to submission, we save a lot of time later on when we receive them to approve.

Helping LEAs with the application is seen as qualitatively different from helping LEAs implement the program itself. Forty-two states said that they use technical assistance to help districts plan, implement, and evaluate their programs. Ways in which this assistance is provided are listed in Table 16.

Table 16

Technical Assistance Methods to Help Districts Plan, Implement, and Evaluate Programs

Method	Number of States
Workshops or face-to-face conferences	27
Other individual contacts	11
Planning is a major area; not as much TA in implementation, management areas	4
Use of computer to flag evaluation problems	2
Lots of technical assistance in evaluation	4
Emphasize use of individualized educational plans	1

Thirty-nine states reported that they use technical assistance to help their districts manage Title I programs. Ways in which this assistance is provided are listed in Table 17.

Table 17

Technical Assistance Methods to Help Manage Programs

Method	Number of States
Workshops or other face-to-face conferences	19
Other individual contact	6
Through monitoring visits	10
Through management checklist LEAs administer themselves	2
Emphasis on evaluation as a management tool	2
Workshops on time accounting, fiscal accounting	1
Indirectly--timelines imposed by SEA require LEAs to manage programs to produce these results	1
Emphasis on individualized educational plans	1

From the discussions earlier in this chapter, it was expected that a strong positive relationship would exist between use of face-to-face contacts--whether it be to help districts plan, implement, or evaluate their programs or to help them better manage their programs--and other "quality" measures in the other responsibility area, such as rulemaking, evaluation, monitoring, or parent involvement. Thus, two variables were created to reflect the personalized services provided in the planning, implementation, and evaluation area and similar services provided in the management area. The first two items in each of Tables 16 and 17 were combined to obtain an unduplicated count of states. In this way, 29 states reported the use of workshops or other individual contacts in helping districts plan, implement, and evaluate their programs; and 21 states reported the use of workshops on other individual contacts to help districts manage their programs.

The relationship of these variables to levels of monitoring activity and levels of evaluation data utilization are shown in Table 18.

Table 18

Relationship between Two Personalized Technical Assistance Measures and Levels of Monitoring and Evaluation Activities

	Personalized Technical Assistance Activities			
	Plan Face-to-face		Manage Face-to-face	
Activity Levels	No	Yes	No	Yes
Quality Monitoring				
Low	13	14	16	11
High	7	15	12	10
Compliance Monitoring				
Low	3	15	8	10
High	7	14	10	11
Evaluation Data Utilization				
Low	14	16	21	9
High	6	13	7	12

What is interesting about the relationships (and lack thereof) shown in Table 18 is the relationship between planning face-to-face and the higher levels of both quality and compliance monitoring, while no such relationships existed between manage face-to-face and the two indicators of monitoring activity. As previously noted, high levels of monitoring for quality have been associated with a "quality" orientation in other areas of responsibility. These data suggest that use of technical assistance to help districts plan, implement, and evaluate their programs may be associated with a quality orientation, while use of technical assistance to help districts better manage their programs may be more related to a compliance orientation. That is, better management procedures may be viewed as a tool for achieving legal, more accountable, programs and not as a tool oriented toward achieving program improvement.

Both measures, however, are related to some extent to accountability attitudes expressed in evaluation as measured by the data utilization activity level also shown in Table 18. While the managing face-to-face was very strongly related to the level of data utilization activities (which was shown in the evaluation chapter to be positively related with accountability attitudes in evaluation), the relationship with planning face-to-face was less strong.

This relationship is further illustrated by Table 19 in which these two measures of personalized services are examined as a function of numbers of activities conducted to ensure good data quality in evaluation.

Table 19

Relationship between Personalized Technical Assistance Activities and Attention to Quality Control in Evaluation

	Technical Assistance Activities			
	Plan Face-to-face		Manage Face-to-face	
Evaluation: Level of Quality Control	No	Yes	No	Yes
Low	7	17	14	10
High	12	12	13	11

This table suggests that assistance in the area of management is somewhat more likely to be associated with activities to ensure good data than is attention to planning, implementing, and evaluating programs.

Two additional items from Table 18 were selected to examine further the characteristics of states reporting planning activities: "lots of technical assistance in evaluation" and "planning is a major area."

The four states reporting "lots of technical assistance in evaluation" did not monitor actively for quality or compliance, and they reported few activities to help districts use evaluation data to improve their programs. They were, however, heavy users of TAC services. This finding suggests that, while these states having attitudes that can not be categorized as a "quality" orientation were inactive, they did tend to rely heavily on their TACs to provide evaluation assistance.

Four states reported that "planning was a major area" in technical assistance, rather than management. It was surprising to observe that, while these states did not monitor actively for quality of service, they did monitor actively to ensure compliance. They also tended to be inactive in helping their districts with data utilization, and they did not rely heavily on TACs.

Thus, the states reporting personalized help in planning are a mixture of both a "quality" and "compliance" orientation.

In comparison, the states listed in Table 17 that use the monitoring process to help districts manage their programs are generally active in monitoring for compliance and can be characterized as having a compliance (or both quality and compliance) monitoring orientation.

Thus, both of these personalized methods of providing technical assistance do have strong relationships with accountability attitudes and attitudes that are less of a "quality" orientation. However, there appears to be a tendency on the part of states to use personalized help with project management for purposes of ensuring legality of programs, or at least programs that are accountable, while this attitude was less evident when personalized help was given to help districts plan, implement, and evaluate their programs.

Initiation of Technical Assistance

The Title I coordinators were asked to indicate what percentage of their technical assistance activities to districts were conducted at their own initiation, provided in response to questions from districts, or provided at the suggestion of federal personnel. The results are shown in Table 20.

Table 20

Reasons for Initiating Technical Assistance

Technical Assistance Activities Conducted	Median Percentage of Total Effort	Low	High	N
At SEA initiation	49.0	10.0	100.0	45
In response to questions from LEAs	42.5	0.0	90.0	45
At suggestion of federal personnel	1.0	0.0	30.0	45

Most of the states indicated that their assistance was provided either primarily at their initiation (N = 14) or almost equally as a function of their initiation and perceived responses to their districts (N = 19). In ten states, the assistance was provided primarily in response to requests from districts; in two other states, the coordinators felt that assistance was initiated equally as often by them, requests from districts, and suggestions from federal personnel.

The question was raised as to whether these influences might relate to other factors, such as the reasons why states made rules. It was expected that states taking the initiative to make rules would also be likely to take the initiative in providing technical assistance, while those states making rules in response to perceived outside requests would not.

While approximately one-half (N = 25) of the states exhibited similar patterns of influences in both areas, the remaining did not. One group of states with apparent inconsistencies in terms of influence is worthy of note: seven states with a district or federal role influence were characterized as having a state or both state and district influence in technical assistance. Thus, the same "take charge" attitudes exhibited in rulemaking are not necessarily followed through in technical assistance. A look at states' responses to the rulemaking and technical assistance questions sheds some light on this observation.

These states having a strong district or federal influence in rulemaking indicated that they only made rules in response to outside requests. In some cases, these states feared to make many new rules without a request saying that, since the Title I law was so prescriptive, they did not need to make additional rules and that they did not want to be perceived by their districts as being overly directive. However, although these states indicated that they took more of the initiative in providing technical assistance, their assistance tended to be weak: they provided less intense technical assistance during the monitoring visit, they tended not to use monitoring for quality of service as a way of helping districts improve programs, and they tended not to be active in providing assistance to their districts in helping them use evaluation data to improve programs. In fact, these states were characterized as the compliance monitoring states and as program improvement states in evaluation--ones that had strong feelings about the importance of evaluation and monitoring but did not follow through with activities in either area. Thus, their attitudes in both technical assistance and other areas do not really appear to be inconsistent with each other.

Influence of technical assistance was expected to play a part in selection of particular technical assistance activities. Two different types of technical assistance activities were examined as a function of technical assistance influence: the use of statewide workshops and meetings with LEAs. While states reporting use of statewide workshops did not differ as to reasons for initiating the assistance, those states reporting use of meeting with LEAs showed marked differences. Meeting with LEAs was characterized by a strong district influence, a less strong state influence, and an extremely low federal influence. It is not surprising that use of more personalized services is highly related to the needs of districts.

Changes

The Title I coordinators were asked how their technical assistance activities changed as a result of the provision on technical assistance that was included in Public Law 95-561. Thirty-five states indicated that their activities had changed since passage of the law. Table 21 presents a list of the changes mentioned by the coordinators.

Table 21

Changes to Technical Assistance Activities

Change	Number of States
More emphasis on evaluation	12
More emphasis on parent involvement	8
More emphasis on program matters, not just compliance	7
Content changed to reflect all of the specifics of P.L. 95-561 and the regs	5
More emphasis on the application approval process	2
More emphasis on excess costs	1
More emphasis on complain resolution	1

The two most frequently reported changes--evaluation and parent involvement--were examined with respect to states' attitudes in these areas.

As shown in Table 22, the states reporting more emphasis in evaluation, as part of their technical assistance activities can be characterized as compliance-oriented states. They are inactive in monitoring, both for quality of service and for compliance, and inactive in helping their districts use data to help improve programs. They also did not as a group tend to conduct many activities to improve the quality of their evaluation data nor did they tend to be heavy users of TAC services. They tended to have more negative attitudes toward parent involvement. While they were active in conducting state-level sustaining gains activities, these activities were associated with a more compliance orientation in evaluation.

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Table 22

More Emphasis in Evaluation as a Function of States' Attitudes and Activities

Monitoring

More Emphasis on Evaluation	Monitoring Attitude			Quality Monitoring		Compliance Monitoring	
	Quality	Both	Compliance	Low	High	Low	High
No	5	21	10	19	18	10	17
Yes	1	6	4	8	4	8	4

Parent Involvement

More Emphasis on Evaluation	Parent Involvement Attitude			
	Pro PAC	Less Pro-PAC	Anti PAC	Anti Parent Involvement
No	4	20	11	1
Yes	0	4	6	1

Evaluation

More Emphasis on Evaluation	Evaluation Attitude			Data Utilization		Quality Control Activities		Sustaining Gains Activities			TAC Use	
	Program Implementation	Both	Comparability/ Accountability	Low	High	Low	High	0	1	2	Low	High
No	11	17	7	21	16	19	18	4	17	16	18	19
Yes	5	6	0	8	4	6	6	3	3	6	7	5

States that reported more emphasis on parent involvement actually had more negative attitudes toward parent involvement and conducted fewer parent involvement activities as shown in Table 23. Increased emphasis on parent involvement is also related to a compliance orientation and to the number of quality monitoring activities as shown in the table. The greater emphasis on program improvement activities in evaluation, which is also associated with a profile of less activity, is consistent with a more compliance orientation observed here.

Table 23

More Emphasis on Parent Involvement as a Function of States' Attitudes and Activities

	Parent Involvement					
	Parent Involvement Attitude				Number of Parent Involvement Activities	
More Emphasis on Parent Involvement	Pro-PAC	Less Pro-PAC	Anti-PAC	Anti-P.I.	Low	High
No	3	22	14	0	17	28
Yes	1	2	3	2	2	2

	Monitoring				
	Monitoring Attitude			Quality Monitoring	
More Emphasis on Parent Involvement	Quality	Both	Compliance	Low	High
No	6	23	20	19	22
Yes	0	4	4	7	1

	Evaluation		
	Evaluation Attitude		
More Emphasis on Parent Involvement	Program Implementation	Both	Compliance/ Accountability
No	11	20	7
Yes	5	3	0

While these sets of relationships may seem to be counterintuitive, one explanation is that states that had more positive attitudes were already providing technical assistance in these areas and have been doing so for a longer time. States that said that they were making changes tended to be less active generally. They are, in effect, "catching up" with the more active states.

One interesting observation is that all of the seven states reporting that they emphasized program content more, not just compliance, tended to hold both quality and compliance attitudes in monitoring and both program improvement and accountability attitudes in evaluation. Thus, these states seemed to be conscious of the amounts of time spent in helping districts implement legal projects vs. helping them improve the quality of their projects. These states tended to be active in monitoring for quality of service (but not active in monitoring for compliance purposes) and active in helping districts use data (including TIERS data) to improve their programs. They also conducted numerous activities to improve the quality of their TIERS data. These relationships are shown in Table 24.

Table 24

More Emphasis on Program, NOT Compliance as a Function of States' Attitudes and Activities

More Emphasis on Program	Monitoring						
	Monitoring Attitude			Quality Monitoring		Compliance Monitoring	
	Quality	Both	Compliance	Low	High	Low	High
No	5	22	13	24	18	16	16
Yes	1	5	1	2	5	2	5

More Emphasis on Program	Evaluation								
	Evaluation Attitude			Quality Control Activities		Data Uses Activities		Use of TIERS to Improve	
	Program Implementation	Both	Compliance/ Accountability	Low	High	Low	High	No	Yes
No	16	16	7	23	19	26	15	17	25
Yes	0	7	0	2	5	2	5	2	5

The states reporting emphasis on program activities, not just compliance, are more active than those states reporting greater emphasis on evaluation or parent involvement. Perhaps because of their recognition that both accountability and program improvement are important to the success of the program, they were able to target even their activities that may be considered accountability (such as actively monitoring for quality of service and working to improve the quality of their data) to help districts improve their programs.

Relationship with the Department of Education

When asked how helpful ED had been in the area of technical assistance, ten states said that ED had been helpful, four states said ED had been "somewhat helpful," and only one state said ED had hindered them. The comments made by the coordinator who felt ED had hindered his efforts were quite strong:

> ED has not met our needs in a timely manner, whether the need was for policy, assistance, written guidelines, program review letters, or answers to letters.

Twenty-two states, however, said that ED had been neither helpful nor hindering, and an additional ten states reported that they did not consult ED on any matters relating to technical assistance. In other words, well over one-half of the states did not report any definite opinions about relationships with ED. Clearly, ED was portrayed as rather "out of the picture" in terms of technical assistance; the focus is on the SEA and LEA level.

Relationships with the Title I Technical Assistance Centers

As indicated in the Introduction to this chapter, the Department of Education funded 10 regional Technical Assistance Centers, beginning in 1976, to help states increase their capacity in the area of evaluation as well as to help states carry out their technical assistance activities in the area of evaluation. Over the years since their inception, states developed close working relationships with their TACs and have relied on them to provide numerous technical and support services in the area of evaluation.

Particularly in states with small Title I staffs or with large numbers of LEAs, greater reliance on the TAC to provide evaluation services was expected. In fact, the measure of the extent to which TAC services were used shows no significant differences between low users and high users in terms of the numbers of staff in the state Title I office or in the numbers of staff available to the state from any regional offices or other evaluation consultants. Furthermore, use could not be described by amounts of funds available for state administration or by numbers of LEAs. TAC use was also equally distributed among the states with independent and decentralized organizational structures and equally across states with some regional offices and those with none. Reliance on TACs, then, is not to compensate for small numbers of staff or resources. As indicated in the chapter on Evaluation, TACs were also not used to provide assistance in evaluation areas of low perceived importance, such as sustaining gains, simply so that the states could report being in compliance with the law. Thus, it appears that use of the TACs is, perhaps, a more personal matter between the states and their TACs rather than use being dictated by lack of resources.

When states were asked how helpful their TACs were, forty-six states said that the TACs were helpful. One said that the TAC had once been helpful but had outlived its usefulness. Only one state coordinator said that his TAC was not helpful to him but perhaps was helpful to his evaluator. This distribution of responses, however, still does not capture the full extent of the states' enthusiasm about the TACs. The TACs were described as being essential to the SEA (e.g., "couldn't do it without them"), and their performance was typically characterized as exemplary (e.g., "they have been routinely fantastic," "[creating the TACs is] the best thing the feds have ever done"). When the coordinators were asked about particularly helpful TAC services, they gave the responses presented in Table 25.

Table 25

Particularly Helpful TAC Services

Service	Number of States
Workshops	22
Preparation of information and materials on evaluation issues, tests, student selection, etc.	22
Helped to integrate evaluation with needs assessment and program	9
Responsiveness to LEA requests	12
Responsiveness to SEA requests	8
A/V materials on evaluation issues	2
Development of evaluation materials for parents	1
Helped make state evaluation more valid	1
Assistance with long-range evaluation planning	1
Provision of technically competent people	4
Provision of capable people who are also "practical" oriented	1
TAC not imposing itself on state	1
Forms design	4
Computer programs	1

With very few exceptions, the states reported that their TACs provided valuable, if not essential, services and that a close and positive working relationship between the SEA and TAC exists.

The following example is presented to illustrate why it is not surprising that no demographics were able to differentiate states on the basis of TAC usage. Four states indicated that one of the positive strengths of the TAC was their extremely technically capable staffs. In two of these states, however, "technically competent" meant TAC staff who could talk to their research and evaluation units about the complexities of test-retest reliabilities, regression analyses, advantages and disadvantages of using a correction factor to enable schools to select program participants using the pretest, computer programs that could be used to conduct both error checks on the data and do sophisticated analyses of their data, and so on. For the other two states, which were small to medium in size and which had a staff person assigned as evaluator who was not trained in evaluation or measurement, "technically competent" meant TAC staff who knew more about the TIERS evaluation models and research design than the state staffs did. Thus, when categories are made up of such different states, no apparent trends can be expected.

As shown in Table 25, nine coordinators indicated that TAC staff had helped them better tie evaluation into the program. As might be expected, these states had both program improvement and accountability attitudes in evaluation and both quality and compliance attitudes in monitoring. They reported meetings with LEAs and conducting workshops as technical assistance methods, but they did not rely much on statewide conferences. While they helped districts plan, implement, and evaluate their programs, they were not as likely to help them better manage their programs. They tended to have a higher level of activity to improve the quality of their data, and they tended to be active in helping their districts use data to improve the quality of their programs. They were split on TAC usage--some relied heavily on their TACs, while others did not. This profile unlike that described for the two change items discussed earlier (greater emphasis on parent involvement and evaluation) is very much a profile of "quality" states. The fact that they were active monitors in the area of compliance and not for program quality is somewhat out of character for this "quality" group, however. These relationships are shown in Table 26.

Table 26

Characteristics of States Integrating Evaluation with Program Design

Integrate Evaluation and Program	Monitoring						
	Monitoring Attitude			Quality Monitoring		Compliance Monitoring	
	Quality	Both	Compliance	Low	High	Low	High
No	4	22	12	20	20	11	19
Yes	2	5	2	6	3	7	2

Integrate Evaluation and Program	Evaluation								
	Evaluation Attitude			Quality Control Activities		Evaluation Data Utilization		TAC Use	
	Program Improvement	Both	Accountability	Low	High	Low	High	Low	High
No	15	16	6	22	18	25	14	19	19
Yes	1	7	1	3	6	3	6	5	4

Integrate Evaluation and Program	Technical Assistance									
	Meet with LEAs		Conduct Workshops		Statewide Conferences		Plan Face-to-Face		Manage Face-to-Face	
	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes
No	12	28	12	28	18	22	18	22	24	16
Yes	2	7	2	7	4	5	2	7	4	5

As noted earlier, states with both quality/program improvement and compliance/accountability orientations may be better able to attempt to integrate the two. They have an awareness that certain compliance activities must be conducted, and this group tended to monitor quite actively in this area, but they also, perhaps, are better able to see how some of the accountability activities can be used to work positively toward program improvement. These states do not just report working in this area, but their attitudes and activities across several responsibilities consistently support their follow through.

When coordinators were asked about TAC services that they thought were not very helpful, only 13 states were able to identify problem areas. As evident from Table 27, no one problem with the TACs was mentioned by more than a few coordinators.

Table 27

Not Very Helpful TAC Services

Service	Number of States
Some TAC staff not competent	3
TAC too technical--initial adjustments needed to work with SEA and LEAs	2
Weak on data utilization for program improvement	1
Weak on early childhood education	1
TAC role too limited--cannot do SEA evaluation	1
TAC branching into areas of questionable expertise	1
TAC staff interact primarily with evaluators and exclude program staff	1

One problem area that was noted both by the coordinators and also by a sample of 20 evaluators interviewed subsequently onsite (the answers of the evaluators are not reflected in this table) was TAC staff competence. Highly qualified staff were admired and respected. However, both large states with experienced and technical evaluators and smaller states with less experienced staff tended to underscore the importance of having these extremely qualified people be facile enough to converse with a non-technical audience. While less technically experienced staff may have felt the knowledge gap more, the same feelings were also strongly echoed by the states with research units or evaluators. While this type of problem was encountered less frequently now than in the early days of the TAC effort, experiences with staff who were unable to communicate using non-technical language made lasting negative impressions on some state coordinators.

When asked what they would like to see as a future role for TACs, 18 coordinators indicated that they would like TACs to continue as is, and another 14 wanted the TACs to continue but broaden to include other areas, such as curriculum. Only five states felt that the TACs should terminate, and one other felt the TACs should terminate if the cost of their operation would result in less funding for states.

The continue as is vs. broaden issue for TACs generated some strong feelings from some of the coordinators. While some felt that TACs should move into program areas, such as curriculum, others felt just as strongly that the TACs should maintain evaluation as their primary focus.

A further look at the six states that wanted to see the TACs terminated shows that they were the ones who had problems with their TACs. Some of their reasons are: The TAC was not helpful to program staff, the TAC was helpful in the past but has no role in Chapter 1, the lesser role given to evaluation in the future means that the Title I unit can handle all of the demands for evaluation assistance on its own, now that the state has implemented the models there is no need for TACs, and the TAC has outlived its usefulness by branching into questionable areas, such as curriculum. These coordinators tended to be a mixture of quality and compliance orientation, they were equally divided among their use of TACs and whether they began implementing TIERS before or after it was mandated in 1978.

Problems

When Title I coordinators were asked what problems they had encountered in carrying out their technical assistance activities under P.L. 95-561, only three coordinators indicated having any problems carrying out Section 166. They tended to be minor; in fact, one state indicated that the problems were "insignificant and nothing we can't solve." One state reported, with a loss in funds, the state had lost access to its computerized network through ERIC; this meant they might lose access to the research on exemplary programs. Several states indicated that they encountered no problems with technical assistance, "because we were always supposed to be doing this."

Twenty-six coordinators, however, indicated problems in providing assistance to their districts on some of the LEA requirements. A listing of the problem areas is shown in Table 28.

Table 28

Reports of Technical Assistance Problems by District Requirement

Type of Problem	Number of States Reporting	
Funds Allocation	32	
• Maintenance of effort		2
• Excess costs		10[a,b]
• Supplement not supplant		6[a,b]
• Comparability		12[a]
• Exclusions from excess costs and comparability		2
Targeting and Eligibility	13	
• Designating school attendance areas		7[a]
• Children to be served		1
• Private school participation		5[a]
Program Design	22	
• Purpose of program		1
• Assessment of educational need		6[a,b]
• Planning		1
• Sufficient size, scope, and quality		3[a]
• Expenditures related to ranking of project areas and schools		2
• Coordination with other programs		1
• Teacher and school board participation		3[a]
• Training of education aides		1
• Control of funds		1
• Complaint resolution		1
• Individualized plans		1
• Noninstructional duties		1
Evaluation	4	
• Evaluation		3
• Sustaining gains		1
Parent Involvement	10	
• Parent participation		2
• Parent Advisory Councils		8[a]

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[a] These items were mentioned as being a "major" problem by at least one state Title I coordinator.

[b] These items were mentioned as being a "major" problem by at least one-half of the state Title I coordinators who reported it as a problem.

As evident from the table, major problems were encountered by the coordinators when they assisted districts with the funds allocation provisions and some of the targeting provisions. The "equitably provided" clause of Section 130 relating to expenditures for private schools was difficult for many states, simply because they were unsure of what the provision meant. The sufficient size, scope, and quality provision appeared again as a problem in technical assistance; lack of understanding of what the provision meant was one of two most frequent problems cited --the other being how to provide assistance to districts on "what works" so that districts can improve their programs. The last major problem related to the Parent Advisory Councils. Since councils were extremely difficult for some districts to implement (e.g., elections, membership requirements, failure of parents to participate), states tried to work with districts to arrive at "creative" but legal ways of meeting these requirements.

Exemplary Practices

When asked whether the state Title I coordinators had developed any practices or materials in the area of technical assistance with which they were particularly pleased and that could be shared with other states, 30 state Title I coordinators answered affirmatively. Six coordinators indicated that they had developed various technical assistance practices that they felt worked successfully for them, such as methods for providing technical assistance; nineteen coordinators reported developing materials that they felt were exemplary, such as handbooks, management/monitoring materials, materials for particular LEA requirements, materials on program design, and audio-visual materials; and five coordinators reported developing both practices and materials.

The states reporting the development of exemplary practices are quite different from those reporting the development of exemplary materials. While those reporting practices tended to spend a greater proportion of staff time on parent involvement now and wanted to spend more staff time on parent involvement in the future, those reporting exemplary materials did not--this group wanted to spend considerable less staff time in parent involvement in the future. On the other hand, the states reporting exemplary materials were currently spending more staff time in program design requirements and wanted to spend even more time in the future on program design issues, while those reporting practices did not. The states reporting exemplary materials also wanted to spend more staff time in evaluation in the future, while those reporting exemplary practices were more satisfied with the current amount of time spent in evaluation.

One unexpected finding was that states reporting either practices or materials tended to report spending less time on their technical assistance activities than the remaining states. It had been expected that states investing time and effort to produce exemplary practices or materials would tend to report spending more time in this area. The data, however, suggest otherwise.

States that reported taking the initiative to provide technical assistance were expected to have been more likely to develop technical assistance practices or materials. The opposite relationship was actually observed--both groups did not differ from the remaining states on the percentages of their technical assistance effort initiated either by them or by their districts. They did, however, tend to report that a higher percentage of their effort was initiated at the suggestion of federal personnel.

The states reporting development of exemplary materials have a much greater compliance orientation than those states reporting exemplary processes. For example, the states reporting exemplary materials do not monitor actively in the area of program quality, they tend to have more compliance orientation in monitoring and a greater percentage of program improvement attitudes in evaluation, they tend to have more negative attitudes towards parent involvement, they are less likely to be active in helping their districts use data to improve programs, they are not active users of their TACs, and they reported changing their technical assistance activities to focus more attention on evaluation and parent involvement. They were also fairly equally split among their use of statewide conferences, helping districts via face-to-face interactions, and helping districts better manage their programs via face-to-face interactions. This lesser level of activity and greater emphasis on compliance attitudes are typical of the "compliance" states described earlier in this chapter and in the other chapters of this report. The states reporting development of processes, on the other hand, are generally more active, have more positive attitudes toward parent involvement, and have less of a compliance orientation in both monitoring and evaluation. A comparison of the attitudes and activities of the states producing exemplary materials or practices is presented in Table 29.

Table 29

Attitudes and Activities of the States Reporting Exemplary Practices or Materials: A Comparison

Exemplary Practices

	Monitoring							Evaluation							Parent Involvement					
Development of Exemplary Practices	Monitoring Attitude			Number of Quality Monitoring Activities		Numbers of Compliance Monitoring Activities		Evaluation Attitude			Numbers of State-level Data Uses Activities		TAC Use		Parent Involvement Attitude				Numbers of State-level Parent Involvement Activities	
	Quality	Both	Compl.	Low	High	Low	High	Program Implementation	Both	Compliance/ Accountability	Low	High	Low	High	Pro-PACs	Less Pro-PACs	Anti PACs	Anti P.I.	Low	High
No	4	22	12	22	17	23	16	14	16	6	27	12	21	18	3	18	14	2	16	23
Yes	2	5	2	4	6	5	5	2	7	1	3	7	4	6	1	6	3	0	3	7

	Technical Assistance											
Development of Exemplary Practices	Use of Statewide Conferences		Use of Meeting with LEAs		Help LEAs Plan Fall-to Fall		Help LEAs Manage Fall-to Fall		More Focus on Evaluation		More Focus on Parent Involvement	
	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes
No	16	23	14	25	17	22	25	14	27	12	31	8
Yes	6	4	0	10	3	7	3	7	10	0	10	0

Exemplary Materials

	Monitoring							Evaluation							Parent Involvement					
Development of Exemplary Materials	Monitoring Attitude			Number of Quality Monitoring Activities		Numbers of Compliance Monitoring Activities		Evaluation Attitude			Numbers of State-level Data Uses Activities		TAC Use		Parent Involvement Attitude				Numbers of State-level Parent Involvement Activities	
	Quality	Both	Compl.	Low	High	Low	High	Program Implementation	Both	Compliance/ Accountability	Low	High	Low	High	Pro-PACs	Less Pro-PACs	Anti PACs	Anti P.I.	Low	High
No	2	14	7	11	14	15	10	7	11	5	17	8	10	15	3	11	9	1	7	18
Yes	4	13	7	15	9	13	11	9	12	2	13	11	15	9	1	13	8	1	12	12

	Technical Assistance											
Development of Exemplary Materials	Use of Statewide Conferences		Use of Meeting with LEAs		Help LEAs Plan Fall-to Fall		Help LEAs Manage Fall-to Fall		More Focus on Evaluation		More Focus on Parent Involvement	
	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes
No	9	16	4	21	9	16	15	10	21	4	23	2
Yes	13	11	10	14	11	13	13	11	16	8	18	6

To understand more clearly why the states reporting development of exemplary practices were different from the states reporting development of exemplary materials, the content of the items developed was examined. It appears that much of the focus of the technical assistance effort by the "materials" states was on achieving compliance: handbooks on the Title I program requirements, papers on particular LEA requirements, and management/monitoring materials were particularly focused toward compliance, and these items comprised more than two-thirds of all materials produced. The seven states reporting the development of management/-monitoring materials, for example, were equally divided among levels of quality and compliance monitoring activities, they tended to have rather strong compliance monitoring attitudes, and all but one reported conducting technical assistance as part of the monitoring onsite visit to their districts.

The "practices" states, on the other hand, reported development of exemplary practices that appear to be more oriented toward program improvement. Examples are: development of a training program for parents; development of a weekend training program for teachers, aides, and parents; financial support given to teachers during the summer to develop new practices and ideas that were to be used in the Title I program; use of exemplary teachers sent to districts to demonstrate teaching techniques while the local district's teachers observed; the inclusion of LEA personnel on state monitoring visits to other districts so that they can learn how other districts administer Title I programs; the successful consolidation of technical assistance efforts across Title I and other state federal programs: the development of a long-range planning program. Thus, all of these efforts appear to be more focused on improving programs and less oriented toward achieving compliance.

Use of Materials Produced by Other Sources

It was hypothesized that states might be more likely to use materials produced by ED, contractors, or other states if they had not developed exemplary materials of their own or if they did not rely on many methods of providing technical assistance. That is, states might tend to compensate for their own inactivity or lack of staff by relying more on other sources.

A variable was created that reflected the extent of states' use of materials produced by other sources. The kinds of materials states reported using are listed in Table 30.

Table 30

States' Use of Resource Materials

Material	Number of States
ED Handbook - Reviewing Project Applications	12
ED Curriculum Guides • Minimum competency Guides • State/local curriculum Guides • Program Guides 44, 45A	5
Materials Produced by National Diffusion Network	35
Materials obtained from National or State Conferences	28
Project Information Package (PIP) materials	28
ERIC Documents and Materials • Reading programs • Skills programs • Needs assessment	6
Materials produced by Other States • Handbooks • States' district applications • Monitoring forms • "A Report Card for Parents" • Kindergarten materials • Compilations of Audit procedures • Standards for reading programs	9
Other Materials Produced by ED • Learning Strategies and Evaluation for Teachers • "Winners All" • Draft Title I law and regulations • "Title I--How it Works" • "Title I--Basic Skills for Secondary Schools"	9

States with fewer staff did not tend to rely more on use of other resource materials. It was also not the case that states that did not produce exemplary materials or practices were particularly likely to rely more heavily on these other materials as shown in Table 31.

Table 31

States' Use of Other Resources as a Function of Development of Exemplary Practices

Development of Exemplary Practices or Materials	Use of Other Resources Low (0-3)	High (4-7)
No	14	5
Yes	17	13

There was, however, an inverse relationship between use of materials from other sources and the number of methods reported by states to provide assistance to their LEAs--the fewer the methods used to provide technical assistance, the greater tendency to report use of more materials produced by other resources.

It was learned during the interviews that, while almost all states reported using materials developed by ED, some states were extremely sensitive about using materials produced by other states. Their reactions were varied--some could not bring themselves to use materials developed by particular states; others indicated they shared materials only within a small group of states like themselves; a few indicated that, if any materials were used in their states, they themselves would develop them. On the other hand, a large number of states reported freely using materials from other sources. The following is a typical comment from one of these coordinators:

> We use anything we can get our hands on--as long as it is of good quality. We need all the help we can get!

In the area of parent involvement, especially, states were often uncertain about whether some of the materials they used had been developed by them or by another state. In fact, the same parent involvement booklet was submitted to AIR as part of its document review effort by at least three states as their own--the original authorship was lost.

Thirty states indicated that they used materials produced by other states. While use of other state materials was not related to the development of exemplary processes or materials, these 30 states were, in fact, quite different from the remaining states. They were significantly smaller in terms of total Title I allocations and funds for state administration; they had fewer SMSAs over 25,000 and 100,000, fewer LEAs, and less population; they had smaller total state revenues. Interestingly, they were also more likely to spend significantly more time in the area of audits and audit resolution, and more time in program design. While they did not differ significantly from the remaining states in terms of the proportion of technical assistance they initiated alone or in response to requests from districts, they reported initiating a greater proportion of their effort at the suggestion of federal personnel than did these other states. They also had very positive attitudes toward parent involvement and a mixture of quality and compliance attitudes in monitoring and both program improvement and accountability attitudes in evaluation.

Thus, for these states, the data suggest that greater reliance on materials produced by other states may, in fact, be compensating for fewer dollar resources.

Dissemination

States are required by law (Section 166) to disseminate information to their districts in the following areas:

- relevant research findings;
- information about successful compensatory education projects;
- information about federal and state programs that provide health, social, and nutrition services to Title I-eligible students; and
- any other information that will help districts with planning, developing, implementing, or evaluating their Title I programs.

Implementation

Almost all coordinators indicated that they disseminated relevant research findings (N=40), information about successful programs (N=45), and other information about planning, implementing, and evaluating Title I programs (N=44). Those that did not provided a variety of reasons. One coordinator indicated that, since he did not have a newsletter, dissemination of such information was not well coordinated or uniform. It was mainly provided informally on an as-needed basis. One coordinator indicated he did not generally disseminate relevant research findings, because they were not in a form that could be readily understood by local school districts. Generally, however, most coordinators were active in disseminating in these areas. As one coordinator put it,

> If anything appropriate comes across my desk, I send it out.

However, only about one-half of the coordinators (N=21) reported disseminating information about other health or social service programs. Some coordinators cited other units in the state agency that disseminated this type of information. Some coordinators simply did not see this activity as part of their role. Others indicated they provided the information only at the request of LEAs. Several coordinators mentioned that they did not disseminate information in these areas, but that they knew that their migrant program office did. They felt that this effort was sufficient, since the information was reaching the populations that needed it.

Dissemination of information about health, nutrition, and other social service programs was felt by some coordinators to be difficult. In the words of one coordinator,

> It is always difficult to disseminate information about another agency's programs. It sounds good in the statute, but it is hard to implement.

This particular coordinator spent considerable effort to survey the available programs, compile the information, and send the results back to the districts telling them what kinds of services are available from each type of agency. Other coordinators decided that this amount of effort was not productive, since it took time away from their major tasks of helping districts plan, implement, and evaluate their programs. Some also tended to feel that local social service agencies were in a better position to provide more specific and up-to-date information than they at the state Title I office could.

Approximately one-half of the coordinators (N-21) indicated that their dissemination efforts had changed as a result of the 1978 law. A list of the changes reported is included in Table 32.

Table 32

Changes to Dissemination Activities

Change	Number of States
More dissemination of parent involvement materials	6
More dissemination of evaluation-related materials	5
More emphasis on dissemination of information on successful programs	4
More dissemination on new areas required by 1978 law	6

The first three types of changes listed above were reported primarily by coordinators that had both a quality and compliance orientation in monitoring and both a program improvement and accountability orientation in evaluation. All of the four states indicating more emphasis on successful programs, for example, also reported use of meetings with LEAs and helping LEAs plan face-to-face as technical assistance strategies. The five coordinators indicating greater emphasis on evaluation, on the other hand, reported helping their districts manage their programs.

Problems

Only five Title I coordinators indicated that the dissemination provision in Section 166 caused problems for them. Three of these commented that their problems were caused by the NDN. Their comments include:

> We are required to disseminate information on exemplary education practices. We rely on NDN for this, since we don't have the resources to do it. NDN gets millions of dollars to do just this, but the cost to LEAs for validation and adoption of NDN projects is way too high. The problem is further compounded by the fact that some NDN-funded projects are not legal according to Title I rules and regulations. We shouldn't promote projects that would invite an audit exception.
>
> NDN is "selling" programs, and we refuse to do that when disseminating information about successful programs. NDN wants adoptions of programs rather than matches of programs to needs.
>
> If a program is successful in New York City, it is doubtful that it will also work on one of our Indian reservations.
>
> Adoption of such programs conflicts with meeting the needs at the local level and it's too costly besides.
>
> ED tried to help us through the NDN, but NDN was a waste of money.

While 29 of the coordinators indicated that ED had been helpful to them in this area, 13 indicated that they either did not consult with ED on this area or were neutral about their relationships with ED. The coordinators who felt ED had been helpful to them cited ED's support of their efforts, ED's encouragement to be active in this area, ED's provision of materials that were helpful to them, and ED's establishment of the National Diffusion Network. Three state coordinators felt that ED actually hindered them to carry out their dissemination responsibilities. They commented that

> ED is always tardy in sending us information that might be "state of the art" at the time we need it.
>
> ED should have more and better information to disseminate on successful educational practices.
>
> Too little too late is always the problem.

Exemplary Practices

Twenty-nine coordinators indicated that they had developed successful dissemination practices or materials that they were pleased with and that could be shared with other states. The most frequently mentioned materials include parent involvement materials (N=12), state guidelines or handbooks (N=8), and materials on exemplary projects (N=5). Six coordinators cited developing exemplary practices, such as dissemination conferences, use of newspapers as a dissemination vehicle, and a parent hotline.

Technical Assistance and Dissemination Continuation Plans

At the end of the technical assistance and dissemination sections of the interview, states were asked whether they would continue to provide technical assistance and to disseminate information to their districts if there were no legal requirements for them to do so. Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As part of the interviews conducted onsite to a representative sample of 20 states, state-level personnel were queried specifically about their continuation plans under Chapter 1. By this time, Chapter 1 requirements were a little better understood, and state coordinators were beginning to make plans as to what aspects of their Title I practices would or would not be included as part of Chapter 1 management.

The discussion on continuation plans is presented in two parts. The speculative answers provided by the 49 Title I coordinators during the telephone interviews will be summarized and interpreted first. The information obtained from the 20 state Title I coordinators in response to specific probes about their plans to provide technical assistance and dissemination under Chapter 1 will be presented next.

Technical Assistance and Dissemination: A Speculation

The answers of the coordinators to the theoretical question, whether they would continue to provide technical assistance if it were not expressly required by law, are summarized in Table 33.

Table 33

Technical Assistance Continuation Plans

Plan	Number of States	
No/Don't know	3	
Continue providing technical assistance in some form	46	
- Continue similar practices		20
- Emphasize planning and evaluation		10
- Continue in some form, since technical assistance is a high priority		6
- Emphasize program content more than in the past		5
- Emphasize only fiscal areas		2
- Specific plans depend upon wishes of Chief State School Officer		1

As apparent from this table, almost all states indicated plans to continue providing technical assistance in some form. The majority of states wanted to continue to provide assistance in ways that were very similar to current practices. These states reported spending significantly greater proportions of staff time on technical assistance and a desire to spend more time on evaluation in the future. While they had fewer LEAs than the remaining states, they also had a much greater amount of state administrative funds per LEA.

In comparison, the 10 states reporting that they would like to emphasize planning and evaluation in their future technical assistance efforts had more LEAs and a smaller amount of state administrative funds per LEA. They spent less staff time working in the area of funds allocation and wanted to spend even less time in the future on these activities. While they wanted to spend more staff time on evaluation in the future, they wanted to spend much less time on parent involvement. While they tended to have fewer staff in their central offices, they did not differ from the remaining states in terms of the total numbers of staff available to them from regional offices or other units in the state agency.

The states indicating continuation of similar practices are generally less active monitors and less active in helping districts use their evaluation data to improve programs. They also are a mixture of the quality and compliance states--they stand out only in their extremely positive parent involvement attitudes. The profile of these states fits that of "compliance" states.

The states indicating more emphasis on planning and evaluation stand out, in part, because of their extremely negative attitudes toward parent involvement. They tend to have both quality and compliance attitudes in monitoring and both program improvement and accountability attitudes in evaluation--all of which fit the profile of "quality" states discussed earlier.

These relationships are depicted in Table 34.

When the Title I coordinators were asked if they would continue disseminating information even if there were no requirements to do so, the overwhelming response was yes (N=41). Most of them (N=22) indicated that they would plan to disseminate information pretty much as they do now--which basically includes dissemination information on successful practices and information on planning, implementing, and evaluating programs.

Table 34

Comparison of States with Similar Technical Assistance Plans and States with Emphasis on Planning and Evaluation

	Monitoring							Evaluation			Parent Involvement			
	Monitoring Attitude			Numbers of Quality Monitoring Activities		Numbers of Compliance Monitoring Activities		Evaluation Attitude			Parent Involvement Attitude			
Similar Continuation Plans	Quality	Both	Comp.	Low	High	Low	High	Prog. Imp.	Both	Comp. Accnt.	Pro-PACs	Less Pro-PACs	Anti-PACs	Anti-P.I.
No	2	15	10	14	15	15	14	8	16	3	0	14	11	2
Yes	4	12	4	12	8	13	7	8	7	4	4	10	6	0

	Monitoring							Evaluation			Parent Involvement			
	Monitoring Attitude			Numbers of Quality Monitoring Activities		Numbers of Compliance Monitoring Activities		Evaluation Attitude			Parent Involvement Attitude			
Emphasis on Planning and Evaluation	Quality	Both	Comp.	Low	High	Low	High	Prog. Imp.	Both	Comp. Accnt.	Pro-PACs	Less Pro-PACs	Anti-PACs	Anti-P.I.
No	5	20	12	21	18	24	15	15	15	7	4	17	16	1
Yes	1	7	2	5	5	4	6	1	8	0	0	7	1	1

Technical Assistance Plans: Preliminary Views of Chapter 1

During subsequently conducted interviews with a sample of 20 states, the Title I coordinators were probed specifically about their plans to provide technical assistance and to disseminate information under Chapter 1. So that their comments can be placed in perspective, a summary of their past technical assistance activities is included in Table 35. As is apparent from the table, and discussions in other chapters, these states are particularly active in both monitoring, evaluation, and parent involvement. They also relied more on providing personalized services to their LEAs than on the use of large statewide conferences. While they were active in helping their districts with project planning and evaluation, they were less interested in helping districts with project management.

Table 35

National Sample of 20 States: Description of Past Technical Assistance Activities

Variable	No. of States
• Meeting with LEAs	
No	6
Yes	14
• Use of Workshops	
No	8
Yes	12
• Use of Statewide Conferences	
No	14
Yes	6
• Use of Telephone or Correspondence	
No	7
Yes	13
• Technical Assistance Provided During Monitoring Visit	
No	6
Yes	14
• Change-More Focus on Evaluation	
No	16
Yes	4
• Change-More Focus on Parent Involvement	
No	16
Yes	4
• Change-More Focus on Program, Less on Compliance	
No	18
Yes	2
• Helping LEAs Plan Face-to-face	
No	6
Yes	14
• Helping LEAs Manage Face-to-face	
No	14
Yes	6
• Development of Exemplary Practices	
No	15
Yes	5
• Development of Exemplary Materials	
No	12
Yes	8
• Use of Materials Developed by Other States	
No	7
Yes	13
• Continuation of Technical Assistance in Some Form[a]	
No	0
Yes	20
: Similar practices	9
: More emphasis on planning and evaluation	5

---

[a] Data collected during initial telephone interviews.

The future continuation plans of the 20 coordinators under Chapter 1 are shown in Table 36.

Table 36

Technical Assistance and Dissemination Plans under Chapter 1

Plan	Number of States Reporting
• Too early to tell	1
• No change	7
• Do less technical assistance than before	9
• Do more technical assistance than before	3

As is evident from Table 36, the states are fairly evenly divided as to whether they plan to decrease their efforts or continue as is, or even increase their efforts. Despite the fact that some states anticipated less effort in this area, all saw technical assistance as a proper role for the state. A sample of comments made by the Title I coordinators is illustrative:

> The role of the SEA is to ensure quality control. Technical Assistance is the proper role for the SEA. We provide services that LEAs are not staffed or don't have the resources to provide.
>
> Our entire focus is technical assistance--always has been and always will be.

Two primary reasons given by the coordinators as to why they feel less effort is a realistic appraisal of their future plans are (a) fewer dollar resources, which in turn can support fewer staff; and (b) absence of a legal mandate. Sample comments made by these coordinators are:

> How can we do more with less?
>
> With fewer dollars, how do we choose--should we put the dollars on staff to keep them on board or put them in to travel, which means we have to cut some staff?
>
> LEAs will need even more help to develop quality programs but won't get as much as they need, since we have fewer staff.
>
> Our evaluation folks will not be able to provide as much technical assistance as before, since they will have to cut their staff.

> With fewer staff and resources, we have to make sure our districts are legal first. Only after that can we provide technical assistance.
>
> If technical assistance is not required by law, my state may force me to consider it a low priority. With shrinking federal and state dollars, fewer dollars will go into low priority activities.

The states indicating less future activity in technical assistance planned to cut back in several ways. While some wanted to reduce the amount of assistance provided, others wanted to attempt to maintain their current levels but reduce the intensity of each interaction. Comments on the future technical assistance and dissemination activities include:

> We will visit LEAs only on request. We will force ourselves on LEAs only occasionally to keep the fires burning for Title I. Will keep the SEA on their minds so that program quality and consistency is maintained. We will do less, but content will not suffer.
>
> Technical assistance through large workshop formats will be the approach. Will do less individually tailored technical assistance to LEAs than we did before--we will be forced to gather LEAs together for group presentations more often.
>
> Dissemination will decrease. While technical assistance will be a main activity of the Title I office, we won't be able to visit as many LEAs and won't be able to provide as much indepth assistance as we used to.
>
> We will have to do less than before because of fewer staff. But our locals will still need help, though! To make it easier on them, we will try not to change too much--only the amount given.

The states indicating similar or increased levels of technical assistance often indicated coordination of their efforts with those of existing state programs (e.g., existing state-local dissemination networks, state compensatory education programs) as the reason for continued support in this area.

Five states, however, alluded to several creative ways of providing technical assistance that they hoped would allow them to continue with the same or increased levels of effort in this area but with fewer staff and dollars. Their ideas are:

> We will try to do more linking of problems to potential alternative solutions by introducing LEAs to each other. We will also look for more low-cost but effective methods of providing assistance.

> We will do less monitoring, which will allow us to do more in the area of technical assistance.
>
> We will rely more on content specialists from within our state and the TAC to provide the help that we are unable to.
>
> We want to hold training workshops for LEAs, for example, in the area of computer-assisted instruction, and then have them train other LEAs.
>
> We want to tie in our efforts more to existing conferences through state reading and math associations.

This latter group of states was very interested in receiving information about other low-cost methods of providing personalized assistance. Some also wanted more information on exemplary programs and relevant research findings, particularly classroom methods that work in compensatory education programs. The unanswered question was, who will provide this assistance to states? While ED is the likely choice, the lesser role prescribed for ED by Chapter 1 may make a provision of uniform assistance to all states more difficult. While many states utilized NDN services, as indicated earlier in this chapter, some felt that this network was "not strong enough for compensatory education programs." The concern was that not enough information on exemplary compensatory education programs focusing on special needs populations was available through NDN.

What is apparent from an examination of these continuation plans is that two groups of states emerge: One group is responding to the lack of available resources by turning to a greater use of large scale and less personalized statewide conferences and using personalized services less, since they are both staff-intensive and expensive. The other group is responding to the lack of available resources by turning to low-cost ways of providing more personalized services to their districts. A major finding of this study is that use of personalized interactions between SEAs and LEAs is more often associated with quality management than are less personalized interactions. If it can be assumed that a quality oriented management leads to more high quality programs, then it would be disadvantageous to encourage states to rely more on these large-scale workshops at the expense of some more personalized interactions.

What appears to be needed is greater attention being paid to the dissemination of effective personalized services that are also low cost. Currently, ED appears to be taking on the role as a catalyst in this area to stimulate thinking in this area. This initial effort on the part of ED, coupled with interest and support from the network of Chapter 1 coordinators is promising. The new practices that grow out of these discussions may take time to implement, and some states may adopt a "wait and see" attitude before replacing their current activities with these new ones. Thus, increased support for this effort is essential for its success. Whether this support can come from the ED, the TACs, NDN, the Chapter 1 coordinators themselves, or state and national organizations is, at present, unknown.

Technical Assistance and Dissemination: A District Perspective

A sample of 62 districts was asked specific questions about the types of technical assistance they received from their state Title I units. All 98 LEAs were asked about key features of the assistance that they particularly liked or didn't like.

When the LEAs were asked to indicate who provided the technical assistance they received, the most frequently mentioned sources were the state or regional Title I office staff, their Technical Assistance Centers, and other content specialists within the SEA. These individuals provided assistance through workshops, onsite consultations, by telephone, newsletters, other written materials, and as part of the monitoring process. Four districts reported unusual methods of assistance in combination with the typical methods previously mentioned. These include the use of closed-circuit television, other audio-visual materials, and sharing of information with other schools. The numbers of technical assistance methods reported by LEAs as a function of the number of technical assistance methods used by their SEAs is shown in Table 37.

Table 37

Comparison of Technical Assistance Received by Districts with State Reports of Technical Assistance Methods Provided

Number of Technical Assistance Methods Received by Districts	Level of State Activity Low (0-4)	High (5-8)
One	3	0
Two	7	3
Three	28	16
Unusual Method	3	1

From this table it is apparent that a relationship exists between activity levels reported by states and districts. The states that tend to use many methods of technical assistance to help districts tended to be recognized by their districts as active in this area. It also suggests that districts tend to take advantage of the assistance given by their states.

An examination of the number of methods reported by districts as a function of state activities shows several interesting relationships. Table 38 presents the relationship between number of methods reported by the LEAs and states' use of two types of technical assistance methods: meeting with LEAs and use of correspondence or telephone.

Table 38

Number of Technical Assistance Methods Reported by LEAs and State Activities

Number of Technical Assistance Methods Received by Districts	State: Use of Meetings with LEAs No	State: Use of Meetings with LEAs Yes	State: Use of Correspondence or Telephone No	State: Use of Correspondence or Telephone Yes
One	2	1	0	3
Two	5	5	0	3
Three	10	34	15	29
Unusual	1	3	3	1

This table suggests that meetings with LEAs tend to be reported by districts that received several methods of assistance from their states, while use of correspondence and telephone consultations tended to be reported more often by districts receiving fewer kinds of technical assistance. The relationship with statewide conferences as a technical assistance method is in the same direction as those presented for correspondence and telephone but weaker.

These data suggest that the more active SEAs may be more likely to utilize personalized services for providing technical assistance, while the less active states may be relying more on impersonalized services. The discussion in the earlier part of this chapter also suggests that states relying on personalized methods to provide assistance are characterized as having a "quality" orientation, while those that rely more on impersonalized technical assistance methods are characterized as having more "compliance" or accountability attitudes. The data shown here are not inconsistent with this conclusion.

Districts tended to report that most of the assistance was provided at the initiation of the SEA (58 percent, N=51), with the remaining 42 percent provided in response to questions they raised. There was no significant correlation between these values reported by their districts and the values to a similar question given by their states. However, the state-level findings are consistent with the district ones, as states tended to believe that 49 percent of their effort was conducted at their initiation, and 42 percent was provided in response to district requests.

Districts were asked whether their states provided them with the information required of them by law. These responses are shown in Table 39.

Table 39

Assistance Provided by States to their Districts

Area	Number of Districts Reporting No	Number of Districts Reporting Yes
● Has the state provided technical assistance to help LEA		
- Prepare its application?	1	55
- Plan, implement, and evaluate its program?	3	54
- Manage its program?	20	29
● Has the state disseminated information to the LEA on		
- Relevant research findings?	11	45
- Information about successful programs?	4	52
- Information about health, nutrition, and other social service programs?	38	18

The findings in Table 39 are consistent with the attitudes of the states described earlier. Most states reporting providing assistance to help districts to prepare their applications and improve their projects, but they were less unanimous on their feelings about disseminating information on health and social service programs, program management, and relevant research findings.

All districts were asked what they liked best about the technical assistance they received from their states. Two major classes of responses were mentioned as shown in Table 40.

Table 40

What LEAs Liked Best About the Technical Assistance They Received

Response	Number of Districts Reporting
• Positive Feelings about the SEA	54
- Accessibility of central office and regional office SEA staff	
- Responsiveness of SEA staff to LEA requests	
- Good SEA-LEA rapport	
- Competent/knowledgeable SEA staff	
- Provision of timely/up-to-date information	
• Positive Feelings about the Technical Assistance Methods Used	43
- Workshops on particular subject areas	
- Onsite visits	
- Informal discussions with SEA staff	
- Inclusion of LEAs in state-level decisionmaking	
- Inclusion of LEAs in onsite monitoring visits to exchange ideas	
- Use of monitoring to provide technical assistance	

When coordinators were asked what they liked least about the technical assistance provided to them by their states, only 56 coordinators could think of any responses to make. These responses are summarized in Table 41.

Table 41

What LEAs Liked Least About the Technical Assistance They Received

Response	Number of Districts Reporting
• Nothing	16
• Problems with the SEA	34
- SEA consultants give different answers to the same questions, not helpful	
- SEA assigned incompetent staff to small LEAs to train them	
- SEA staff not flexible to consider alternatives and program options	
- Cutbacks in funds reduced the amount of personal contact LEAs received	
- Uncertainty as to whether LEA should call regional offices, central state office, or SEA content specialists for help	
- No special help for new local Title I coordinators	
- Some SEA staff are not inspiring as workshop presenters	
• Problems with the TAC	10
- TAC information on all models is useless because state mandated Model A1 only	
- TAC no longer useful, since state emphasis is on program improvement, not the models	
- TAC is too technical; TAC staff do not communicate well with locals	
- NCEs are not useful; TACs outlived usefulness	
- TAC summaries of technical reports not useful	
• Problems with the Types of Assistance Received	5
- Materials are not applicable to small schools	
- Workshops are confusing	
- Activities that work in some districts should not be thought by SEA to work in all districts	
- Information is often repetitious	

Table 41 (continued)

Response	Number of Districts Reporting
• Problems caused by Federal Law/ Requirements	3
- Federal law and regulations are occasionally misinterpreted	
- Feds force the SEA to pass on too much unneeded materials	
- Feds created too many unnecessary requirements	
• Problems caused by a differing Quality vs. Compliance Orientation	4
- SEA protects itself at all costs--emphasis on program compliance over quality to prevent audit exceptions	
- State is too obsessed with fear of audit exceptions	
- State does too much compliance checking and has too litle focus on quality	
- State gives not enough help to make programs of quality	

Despite these negative comments, most of the local coordinators felt that their states were extremely helpful (N=74, 77.9 percent) or slightly helpful (N=20, 21.1 percent) in the area of providing them with technical assistance. Only one coordinator felt neutral--that the help received was neither helpful nor hindering.

When asked how their states could be more helpful to them, the coordinators tended not to have many suggestions: 35 were entirely satisfied and could think of no ways in which their states could be more helpful to them, 29 made one suggestion, and 14 made more than one. The types of comments made fall into two major categories--those pertaining to ways in which the SEA might change some of the problem areas noted above in Table 43 attributed to the state agency, and areas in which the LEAs wanted more assistance. The most frequently mentioned areas in which LEAs wanted more assistance are:

- more staff development, inservice for teachers and aides (N=10);
- more help with evaluation (N=5);
- more assistance in the area of parent involvement (N=4);
- more conferences or meetings to disseminate information (N=4); and

- more assistance generally in interpreting state rules or guidelines (N=2).

Only five coordinators felt that there were areas in which they would like less asssistance. The primary ones mentioned were evaluation and parent involvement.

A sample of 60 districts responded to the question, if there were no law requiring states to provide technical assistance or disseminate information to LEAs, do you think it is a good idea for your state to do this? All but one answered affirmatively. The smaller districts were particularly adamant on this point. Some of them felt at a disadvantage due to their small size, since they did not feel that they received as much individual attention from their states as larger districts did. Others, particularly those far removed from their state's Title I office, valued whatever assistance they received, since large travel distances meant less personalized contact to begin with.

It had been hypothesized that states with regional offices would be in a better position to provide more frequent technical assistance to their districts. While this relationship was not statistically significant, perhaps due to the small numbers involved, the importance of meaningful regional offices cannot be underestimated. In states where the regional offices were an integral part of the Title I organization, most of the districts interviewed in the state had glowing praise for the consultants in these offices. While some problems with coordination (between regional offices and the central office) and incompetent staff were noted, these problems were not unique to the regional offices.

If states encounter reduced budgets in the future, extensions of their staff in regional offices around their states--or housed in local universities, for example--may be viable alternatives that states could explore to extend their available resources. The use of regional office staff would also facilitate more frequent personalized contacts, which have been associated with quality management in states.

EVALUATION

EVALUATION

Chapter Highlights

Evaluation, defined broadly, had at least three components given to it by the 1978 Title I law and regulations. Districts had to evaluate the effectiveness of their programs through use of the Title I evaluation and reporting system (TIERS) models, they had to assess their programs over a period longer than the school year in which the program operated, and they had to demonstrate to their states that evaluation data were used to improve programs. The three-tiered administrative structure was apparent in these requirements. The federal role was to collect data in standardized formats (through TIERS) for national aggregation and reporting purposes; states were to collect and aggregate data to submit to the federal government, but they were also to ensure that districts used data to improve their programs; districts were to submit data to their SEAs, but they also had considerable flexibility in implementing the sustaining gains provision.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the evaluation provisions and the regulations on state practices. Because states dealt with evaluation in their state responsibilities--for example, they included evaluation sections in their applications, made rules on evaluation, monitored districts in the area of evaluation--evaluation was included in this study as part of state administrative activities. The impact of the evaluation provisions was assessed by obtaining answers to the following questions:

- To what extent did the evaluation provisions affect states' administrative practices?

- What changes were made to their administrative activities to implement the evaluation provisions?

- What problems did states encounter in implementing the evaluation provisions?

- Did the evaluation provisions stimulate states to develop practices or materials in this area?

- To what extent would states plan to continue to evaluate if this activity were not expressly required?

Some of the study's major findings are:

- Most states rated the provision on evaluation and the Title I law (section 124(g) as having substantial importance, but fewer than one-half of the states rated the sustaining gains provision (section 124(h) as having substantial importance.

- While not all states implemented the sustaining gains provision, the conducting of such activities tended to be associated with the attitude that evaluation was conducted for compliance with the law only.

- States' activities in evaluation were affected by their attitudes toward the purposes of evaluation (program improvement vs. accountability) as well as by the importance they attached to a federal, state, or local role in evaluation.

- States that were active in helping districts improve programs were characterized as having an active quality-oriented management style--they made rules to help districts improve programs, they monitored actively to ensure both compliance and program quality, they tended to use more personalized methods of providing technical assistance.

- Data utilization was often difficult, since states discovered that the TIERS data were not often useful at the local level. Only the more active states, however, tried to use TIERS data in a formative way; but they also encouraged the use of more general formative measures in addition to the summative TIERS measures.

- Despite the problems with TIERS, the states that worked hard to improve the quality of their TIERS data must have been able to overcome them more successfully. Their districts felt that they were much more helpful in providing evaluation help than the states that conducted few quality control activities.

- Almost all coordinators indicated they would plan to continue some sort of evaluation activities even if they were no longer required; and approximately one-third of the states indicated a desire to continue using the TIERS models.

While the TIERS models were mandated only since 1978, 19 states opted to implement TIERS prior to that time. The states that implemented the models early were more likely to plan to continue using the models under Chapter 1, even though they are no longer required. A concern held by a number of states is over the lack of program accountability now that ED will no longer be able to collect nationwide data through use of TIERS. If Congress is not aware of what is happening to Chapter 1 programs, states and districts fear that program funds will be cut even further, which will result in the demise of the program.

States, particularly those considering themselves to be nondirective, were concerned about whether or not they can mandate use of the models in their states if they are not required. Negative reactions from districts and state-level policymakers in these states may make continuation of the models under Chapter 1 difficult.

Many states perceived that Chapter 1 lacked a priority for evaluation. With reduced administrative funds and staff, states may be forced to place their limited resources on high priority management tasks, which may or may not be evaluation.

Introduction

Concern over the effectiveness of the Title I program began in 1965 when Senator Robert Kennedy indicated he felt that the failure of disadvantaged students was due to inefficient and disinterested school administrators. The notion of accountability also received federal support, suggests McLaughlin (1975), because it was believed that (a) evaluation would upgrade local school district practices and lead to a remodeling of educational practices; (b) the government's knowledge of education in general, and federally funded programs in particular, would be increased; and (c) evaluation activities such as data collection and analysis were synonymous with rational decisionmaking processes.

Early nationwide surveys to provide an assessment of Title I impact, which began in 1968, proved to be unsatisfactory. Small sample sizes, the inability of the states to summarize their districts' non-standardized reports, and the fact that certain relevant data were not collected at the local level contributed to the lack of meaningful findings.[1]

By 1973, it became apparent that clearer guidelines for evaluating Title I projects were required. New procedures were needed--ones that would lead to the collection of objective data so that rational policy decisions could be made about Title I programs. When Title I was authorized in 1974, Section 151 of the Education Amendments of 1974 (Public Law 93-380) was added to address these evaluation concerns. Specifically, the law specified that the Commissioner of Education (now Secretary of Education) was to (a) develop and publish standards for evaluation of program effectiveness, (b) provide to states models for evaluation of Title I programs that include uniform procedures, and (c) provide such technical and other assistance as may be necessary to states to help them assist LEAs to implement those evaluation procedures.

The response to the 1974 mandate was the development of the Title I Evaluation and Reporting System, which contained a systematic method of collecting and reporting data from Title I projects--districts collected data and submitted them to the state, where they were aggregated to present a statewide picture of Title I impact before being sent to ED. At the federal level, the data would be aggregated from all states and augmented with information from other federally funded studies to present a nationwide picture of Title I impact to Congress. The TIERS system, as it became known, included not only the evaluation models and accompanying reporting forms and instructions but also an extensive support system for implementation. One large part of the support system was the establishment of regional Title I Technical Assistance Centers (TACs) in 1976 to support the implementation and operation of TIERS. TAC staff were to assist states in implementing the models and also in building capacity in the area of Title I evaluation. TACs were to serve in a supporting role, not one of supplanting state and district responsibilities in evaluation. Cross (1979) indicates that the strengthening of state and local capabilities in this area was one of the prime concerns of Congress in writing the 1974 Education Amendments.

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[1] A complete discussion of the early evaluation efforts, including TEMPO, BELMONT, and other national surveys, is presented in McLaughlin (1975).

This approach was discussed during the 1978 Title I reauthorization hearings. In a report on the 1978 Education Amendments, the House Committee on Education and Labor reviewed the results of a recently released GAO report that suggested that state and local officials see important differences in the types of evidence of program effectiveness that they and the federal officials prefer:

> Although State officials view OE program officials as being most impressed by standardized norm-referenced test results, and local officials view State and OE officials in the same manner, State and local officials say that they are not most impressed by such results. Local officials prefer broader, more diverse information on program results than just test scores and they are most impressed by improvements in curriculum and instructional methods and gains in the affective domain (likes, dislikes, interests, attitudes, motives, etc.). State officials are most impressed by results from criterion-referenced tests... It seems, on the other hand, that OE prefers hard objective data on students' cognitive improvements... The widespread use of standardized norm-referenced tests to evaluate... Title I programs indicates that State and local officials have more frequently based their evaluations on the kinds of results they believe would be likely to most impress higher level officials than on their own preferences. (pp. 51-52)

Thus, questions about whether it was realistic to have a single reporting system serve all federal, state, and local needs were raised by the Congressional committee. The 1978 legislation was designed, in part, to address this concern in the future. For example, a provision was added that ED should consult regularly with state and local administrators as to the practicality of ED's plans (Section 183(d)).

The evaluation provisions of the 1978 law are presented in two places. One section (Part D) outlines the responsibilities of federal administrators, which essentially includes as Section 183 the former provisions (included in Section 151) of the 1974 law. Under Part A, programs operated by LEAs, are two new evaluations provisions. The Evaluation provision in Section 124(g) requires districts to (a) adopt effective procedures for evaluating their programs, (b) assess the extent to which their programs have achieved their goals by including objective measurements over at least a 12-month period, and (c) use the results from evaluations in planning for and improving Title I projects and activities. The Sustaining Gains provision in Section 124(h) requires that LEAs give due consideration to the inclusion of components designed to sustain the achievement of children beyond the school year in which the program is conducted.

The evaluation regulations published on 12 October 1979 provided additional guidance on evaluation to states and districts.[2] The regulations presented in Subpart J included:

- four standards for evaluation (Section 201.171)--representativeness of evaluation findings, reliability and validity of evaluation instruments and procedures, evaluation procedures that minimize error, and valid assessment of achievement gains in reading, language arts, and mathematics;
- general model requirements (Section 201.172;)
- specific requirements for implementing the three evaluation models (Section 201.173)--norm-referenced model (model A), comparison group model (model B), and regression model (model C);
- the use of alternative models to the three mentioned in Section 201.173 (Section 201.174);
- the frequency of evaluations and sustaining gains assessments; (Section 201.175);
- reports of evaluation results by LEAs and SEAs (Section 201.176); and
- allowable costs for evaluation (Section 201.177).

Two major changes in the new law and regulation are noted that turned out to have an impact on state administration. First, the 1978 law permitted districts to conduct evaluations at least once every three years; states could opt to collect representative samples of district data annually to ensure representativeness and still minimize local reporting burdens or they could choose "total population" sampling on an annual basis. Second, while districts were to collect additional information to determine whether the achievement gains measured over nine to twelve months were sustained over a longer period of time, the LEAs were not required to submit the results of these long-term evaluations to their SEAs unless requested to do so by them.

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[2] The evaluation regulations were reprinted along with the final program regulations for Title I when they were published on 19 January 1981. However, they were made final as noted here in 1979.

All of the technical and supporting materials produced to help the states and districts implement the Title I provisions enlarged the supporting system of TIERS as it was called. In addition to the law and the regulations, TIERS included an Evaluation Policy Manual, a User's Guide to the implementation of the system and many papers and monographs on various technical evaluation issues.[3] These were disseminated by ED and through use of the TAC network to facilitate the implementation of TIERS. While the early years of TIERS implementation focused primarily on how to implement the models, states and locals began to request that more attention be paid to issues of program improvement--how to use the TIERS data to improve programs.

Many books and papers on data utilization appeared during these years--some of them stimulated by the increased attention paid to evaluation by the Title I provisions. Data utilization, while the focus of the more recent TAC and ED supported evaluation efforts, was found to be remarkably difficult to achieve. Reports, such as the recent assessment of TIERS (Reisner, Alkin, Boruch, Linn, Millman, 1982), continued to cite problems associated with data utilization: "there is increasing concern with the degree to which program evaluations have practical utility for educational decisionmakers" (p. 46). The comparisons of programs and the search by policymakers for sure answers appeared to become less attainable (Law, 1982). Some states began to feel that reports of project gains had to be moderated by caveats that "the models were not followed correctly," "the gains based on small samples are not valid," "the testing interval was nine rather than twelve months."

While some states clearly applauded the TIERS system because it had increased and strengthened their own capabilities in the area and increased their sensitivity to better evaluation procedures, other states began to become disillusioned by TIERS, because they began to see forms completion as the evaluation focus, not program improvement. While some states believed strongly that evaluation results were needed to "save the program" in Congress and were willing to spend whatever time it took to obtain "clean" or "errorfree" data, others were interested in evaluating their programs using more formative and less structured procedures with the hope that, by doing so, their evaluations would become more meaningful. This age-old problem of conflicting evaluation purposes noted by Congress in 1977 continued to haunt states and districts.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the evaluation provisions and the regulations on state practices. Because states dealt with evaluation in their state responsibilities--for example, they included evaluation sections in their applications, made rules on evaluation, monitored districts in the area of evaluation--evaluation was included in this study as part of state administrative activities. The impact of the evaluation provisions was assessed by obtaining answers to the following questions:

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[3] While the entire policy manual as required by Section 187 of P.L. 95-561 was never completed, the chapter on evaluation (Chapter 10--Evaluation) was completed and disseminated in 1980.

- To what extent did the evaluation provisions affect states' administrative practices?

- What changes were made to their administrative activities to implement the evaluation provisions?

- What problems did states encounter in implementing the evaluation provisions?

- Did the evaluation provisions stimulate states to develop practices or materials in this area?

- To what extent would states plan to continue to evaluate if this activity were not expressly required?

Title I projects operated under the 1978 Title I statute and regulations until August 1981 when the Education Consolidation and Improvement Act was passed. ECIA kept the intent of Title I but revised it to eliminate burdensome and unnecessary paperwork and to free the schools of unnecessary federal supervision. In the final regulations for Chapter 1 passed 29 July 1982, Section 200.54 contains a single provision for evaluation: that evaluation must include (a) objective measurements of educational achievement in basic skills and (b) a determination of whether improved performance is sustained over a period of more than one year. It is clear from the Summary of Regulatory Provisions in the introduction to the regulations that Chapter 1's fewer prescriptions extend to the evaluation models, as no particular evaluation models are now required.

The role given to states or to the Department of Education in the area of evaluation under Chapter 1 is not clearly specified. Section 556(b) requires that "the local educational agency will keep such records and provide such information to the State educational agency as may be required for fiscal audit and program evaluation (consistent with the responsibilities of the State agency under this chapter)," but an unambiguous state role never seems to be defined. Since the federal models are no longer required, and since ED is prohibited from requiring them under the new law, the former role of ED is also called into question. If the models are not used, will ED continue to gather data to submit a report to Congress? How will the program stay accountable to federal policymakers? If the federal requirements are lessened, will states fill the void with new approaches to evaluation?

These were some of the issues that emerged early when data collection began. Thus, the last part of the evaluation section of the interview, namely the theoretical question of states' evaluation practices under a less prescriptive law, took on added significance.

This chapter summarizes the findings of the State Management Practices Study to the five questions listed above. Also included in this discussion are states' preliminary views of the impact of Chapter 1 on their future evaluation activities. The chapter concludes with opinions of a sample of districts to their states' evaluation efforts.

Implementation

Evaluation in its broadest interpretation is considered by all states to be an extremely valuable function, although they disagree about what functions evaluation is supposed to serve. This first section will begin by discussing what important functions evaluation serves and by presenting the resources available to states to conduct their evaluations. Finally, the interrelationship of attitudes and resources on states' administrative evaluation practices will be discussed.

Important Functions Served by Evaluation

Even though evaluation activities have been part of Title I program management at the local level since the program's inception in 1965, and at the state and federal levels since 1964, state Title I coordinators have widely differing views on what purposes the role of evaluation plays in the program. At one extreme, states feel that the sole purpose of evaluation is for accountability to the federal sponsors or to other state-level officials. Comments typically made by coordinators in these states include:

> Evaluation serves only to report to federal and state legislatures.
>
> Getting nationally aggregatable data is important.
>
> We use the Title I evaluation and reporting system for national accountability reasons. This system also fosters development of strong evaluation designs.
>
> While the evaluation requirements may stimulate some interaction between evaluation and project planning at the local level, we evaluate primarily to meet the purposes of the law.
>
> Evaluation is necessary for program accountability--are Title I programs really effective?

On the other hand, some states feel that evaluation plays an important role by serving as a good management tool for identifying problems in programs and then stimulating changes to improve local programs. For these states, data uses at the state and local levels for program improvement are the important purposes of evaluation. Comments made by coordinators in these states include:

> Program improvement is the sole purpose of evaluation.
>
> Evaluation serves to integrate evaluation with program design at the local level.
>
> Evaluation indicates a need for technical assistance.
>
> Data are used to create a state profile to see how effective the programs are.

> Evaluation highlights problems in programs that we can help locals solve.

A large number of states felt strongly that evaluation had a dual purpose--program improvement as well as accountability. This attitude was, perhaps, best expressed by one coordinator who said:

> Evaluation is essential. You can't talk about effective instruction without first dealing with evaluation: Product and process are interdependent... Since the state is the guardian of the public trust, evaluation is for accountability purposes also.

A listing of the primary purposes for evaluation that were mentioned by the Title I coordinators is presented in Table 1.

Table 1

Important Functions Served by Evaluation

Purpose	Number of States Reporting
Improves programs	24
Necessary for program accountability	22
Good management tool; identifies problems	16
Stimulates link between evaluation and program planning	13
Develop support base for Title I among parents, teachers, school board, others	11
Provides objective means for assessing programs, pupils, or teachers	9
Valid data obtained from use of TIERS can be used in federal, state, local aggregations	6
Primarily compliance with the law	5
Provides need for technical assistance	4
Fosters development of strong evaluation designs	3
Other:	
• Basis for research and Ph.D. theses	3
• Evaluation is broader in scope to include planning and decisionmaking in all areas	3
• Evaluation serves no important functions as it is currently implemented; it should but it doesn't	3

The interrelationships among the important functions given to evaluation are shown in Table 2.

From Table 2 several trends are evident:

- Compliance-type attitudes are inversely related to program improvement-type attitudes, such as evaluation is important as a good management tool to improve programs.

- Compliance-type attitudes are not related to attitudes that hold that evaluation primarily serves accountability purposes. Compliance-type attitudes are correlated with the attitudes that evaluation provides an objective means for assessment purposes.

- Accountability attitudes are strongly correlated with the attitude that evaluation helps develop a support base for Title I among its beneficiaries and its constituents.

- Several pairings of attitudes correlate highly with the attitude that evaluation is a good management tool. While attitudes that evaluation provides a link with program planning, improves programs, and provides a need for technical assistance are correlated with the attitude that evaluation is a good management tool, they are not correlated with each other.

Thus, these data offer support for the idea that states might be classified on the basis of their feelings about the importance of evaluation. Seven states were then classified as having compliance/accountability attitudes; the coordinators from these states felt that evaluation served no other function than to meet the requirements of the law, which in some cases, was also interpreted to mean national (or state) accountability. Seventeen states were classified as having program improvement attitudes; the coordinators from these states felt strongly that using data to trouble shoot, to link evaluation with program planning--all for program improvement--was the primary goal for evaluation. The last group, consisting of 23 states, was classified as having both compliance/accountability and program improvement attitudes.

It was expected that, especially for this latter group of states, the feelings about the importance of using good quality data to make management decisions might be in evidence. One relationship that is striking because of its absence in Table 2 is, in fact, a strong relationship between the importance of having good quality data and the importance of using these data to make management decisions regarding changes to improve programs. It was thought that states would feel that the valid data obtained from the use of TIERS would enable them and their districts to make more accurate judgments about their programs than they were able to make prior to TIERS. It is evident from Table 2 that few relationships exist between item 5 and the other data uses variables (valid data used

Table 2

Interrelationships among Evaluation Functions

		Tetrachoric Correlations[a]								
		1.	2.	3.	4.	5.	6.	7.	8.	9.
1.	Primarily Compliance									
2.	Support Base	-.277								
3.	Accountability	-.071	.654							
4.	Strong Designs	.158	.168	.276						
5.	Valid Data in Aggregations	-.067	-.123	.077	.111					
6.	Link with Program Planning	-.120	.017	.026	.100	.120				
7.	Objective Assessments	.381	-.005	-.008	-.033	.298	-.364			
8.	Improve Programs	-.599	-.237	-.228	-.201	.268	.094	-.079		
9.	Good Management Tool	-.420	.076	.116	.010	.011	.438	-.209	.436	
10.	Need for Technical Assistance	.066	.045	.069	.227	.276	-.264	.125	.014	.557

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[a] Correlations of approximately .4 or greater are statistically significant at the $p = .05$ level.

in aggregations), such as items 7 (objective assessments), 8 (improve programs), or 10 (provide need for technical assistance).

This apparent lack of relationship may be due, in part, to states' differing philosophies about what the federal, state, and local roles should be in the area of evaluation. The issue of where the responsibility for evaluation should lie--whether it should be dictated by federal mandate or by local state or district option--was a prominent theme among the interviews. What Table 2 does not reflect is this philosophical undercurrent, which cuts across all of the attitudes toward evaluation. Some examples will be presented to illustrate the complexity of the feelings expressed about evaluation.

One state coordinator who indicated primarily compliance attitudes said:

> We use Model A1 predominantly to evaluate Title I programs in the state. There is not a lot of encouragement from us to do formative evaluations, so most districts limit their evaluations also to use of Model A1. We have not followed up on the sustaining gains requirement at all, because there were not enough "teeth" in the federal requirement to drive state action. We at the state level do not have any activities in the area of using data to improve programs. While some LEAs have gone beyond TIERS without much encouragement from us, most LEAs are evaluating because it is a formal requirement. I like the evaluation provisions--TIERS has enabled us to get nationally aggregatable data, which is extremely important.

This state coordinator apparently liked the federal mandate of the evaluation models; he did not resent them as he felt his state role of providing data summaries for national aggregation was facilititated. While districts could do other evaluation activities if they so chose, the primary thrust of the state effort was to collect Model A1 data.

A state labeled as having both program improvement and compliance/accountability attitudes presents a different picture--one in which there is resentment towards the federal role in evaluation but still recognition of both accountability and program improvement purposes. This coordinator strongly expressed his views as follows:

> Evaluation as it exists today serves to satisfy Congress only. All of the evaluation requirements are stupid--when you ask districts to do stupid things, you lose credibility. While accountability is important, I would leave it up to the states to develop a scheme that shows the schools what progress they are making. Evaluation is a tool for management. The pretest and posttest scores aren't the most important part--what happens in between is. Now we

> have the tail wagging the dog. We should focus on the day-to-day evaluation of pupil progress. We should use state or district norms--not national norms-- because they don't fit our state.

Two state coordinators expressing primarily program improvement attitudes expressed their views this way:

> Evaluation has been required for the man higher up. This is wrong. Evaluation should be only a local (district) concern. The focus should be on assessing and meeting needs at the local level. The current evaluation requirements are rediculous. All you need is a requirement that districts must have an evaluation plan. Leave the details to the district.
>
> Evaluation serves no important purposes the way it has been implemented. We spend a lot of time and effort to prepare our evaluation reports, and what use do the feds make of it? Evaluation is a very important, useful, and valuable function for improving programs. We try to encourage our districts to be active in the area of evaluation, and we encourage them to use programs that appear to be more productive. I would eliminate the annual reporting of data to ED and would like to see evaluation be more of a local option for states and districts.

While these two program improvement-attitude states espoused local control feelings, many other program improvement-attitude states did not. Recognition of federal, state, and local roles in evaluation was expressed this way:

> Evaluation is a state responsibility. The feds put the mandate in the law for us to carry out: we have to collect the information, put it in reports, and send it to ED. TIERS is the best thing that happened to us as far as evaluation goes--we had not had much help on evaluation before this. Too often evaluation is not used to improve programs. We bring evaluation results to the attention of some LEAs that have changed their programs as a result. The implementation of a sound evaluation system at the LEA level, namely TIERS, has given us data that we can have some reasonable confidence in. In this area, we have made more progress since 1978 than we did from 1965 to 1978. While NCE gains may be of little use to LEAs, we urge LEAs to collect additional data that they also use in the evaluation process. We review evaluation data with our districts and encourage them to improve in areas of need.

These comments are also indicative of another major theme running throughout the interviews--namely the issue of quality control. In other words, TIERS, including its support network of ED and the TACs, has provided states with procedures and guidelines, which, if correctly followed, were designed to lead to the receipt of relatively valid data that can be used for decisionmaking. The modifier "relatively" is used, because, as documented by Linn (Reisner, Alkin, Boruch, Linn, and Millman, 1982) in his assessment of the technical qualities of TIERS, it is difficult for even a "correct" usage of the TIERS models to identify small achievement gains when projects have small numbers of participants. What is generally evident from the interview comments is differing amounts of concern for quality control issues. Some states make efforts to improve the quality of their data, because they see an increased value to more valid data to both them and their districts in the area of decisionmaking. Others make efforts to improve the quality of their data, because they view compliance with these procedures in the same way as they view their complying with the other federal requirements.

Throughout the remainder of this chapter on evaluation, efforts are made to examine states' evaluation activities as a function of their attitudes about evaluation. The findings will be influenced by the two issues raised here. Thus, it should be kept in mind that attitudes toward the evaluation models reflect the larger issue of whether evaluation is a legitimate federal concern, as well as states' desires to use (or not use) valid data to make programmatic decisions. States' decisions to follow the federal mandate on evaluation--including the models--are strongly affected by their attitudes toward evaluation and by their view of their own role in evaluation. In the next section, the resources available to states to help them conduct evaluations will be presented, followed by a discussion of other attitudinal factors that might affect states' evaluation activities. The section will end with a discussion of what influences all of these variables have on state evaluation activities.

Resources Available for Evaluation

While the amount of dollar resources available for state administration has not played a very strong role in discussions of how states carried out their responsibilities discussed previously, the amount of Title I funds available to states does play an important role in discussions of evaluation. In the simplest interpretation, greater dollar resources can buy more staff and buy staff with more specialized expertise. It can also buy the use of computers, which may be important not only in reducing the time and effort needed to prepare statewide summaries of achievement data but also in enabling sophisticated quality control checks to be made on the data that would not be possible otherwise. It is therefore not surprising that the choice of evaluator in each state is significantly related to the amount of resources available to each state.

Evaluation Staffing Patterns

In 21 states, a specific staff person(s) from the Title I unit was designated to handle all evaluation-related activities. This individual did not necessarily spend all of his or her time on evaluation. In these cases, the individual also conducted other Title I administrative activities, such as monitoring and reviewing applications.[4] In 11 states, evaluation was assigned to a specialized research or evaluation unit within the state department. In 21 states, the Title I coordinator handled evaluation along with help from his or her staff. Only three states reported other staffing configurations: two relied on outside contractors to carry out their evaluation responsibility, and one state assigned to each Title I consultant the responsibility of handling evaluation activities for his or her districts.[5]

The states that have a specialized unit responsible for evaluation can be characterized as large on many in the allocation, population, and staffing variables examined. For example, they have large amounts of dollar resources--both in terms of Title I allocations, including amounts for state administration and large amounts of total state educational revenues. They are also the most populous states having the greatest population density and most numbers of LEAs. While this group of states did not differ from the others in terms of the numbers of professional staff working in the central state Title I office, they had access to a great number of other professionals who can assist them in their evaluation efforts (average = 24.4)--staff from regional offices and independent evaluation consultants in addition to the staff from the specialized evaluation units. States in which the Title I coordinators and their staff handle evaluation are the smallest in terms of the allocation, population and size, and staffing (average = 9.7) variables just mentioned; and the states with a staff person designated to handle evaluation are intermediate between these two groups on all of these variables.

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[4] The number of states having only part-time evaluators was not collected.

[5] The exact numbers of states in each of these categories were accurate at the time the data were collected. However, shortly before and just after the data were collected, several states indicated plans to modify their staffing. Several reasons were apparent to explain these changes. First, when states realized that the amounts available for state administration were decreased to 1.04 percent instead of the allotted 1.5 percent due to recisions in Title I budgets, some states planned to eliminate the use of outside contractors, the use of other research units or specialized staff in favor of conducting the evaluation in-house. In at least two other states, the coordinators indicated that they planned to reduce staff or were forced to eliminate a subcontractor due to events that transpired within the state agency that had nothing to do with the Title I resources available to them.

Frequency of Evaluations

The frequency with which evaluations were conducted was hypothesized to be an indirect outcome of the available resources for evaluation. That is, fewer staff and dollar resources might result in greater use of the three-year evaluation cycle, while additional resources might facilitate use of annual evaluations.

While the presence of regional offices was not related to evaluation frequency, the staffing pattern was as shown in Table 3.

Table 3

Frequency of Evaluation as a
Function of Evaluation Staff

Evaluation Staff	Evaluation Frequency Annual	Three-year Cycle
Title I Coordinators	10	4
Staff Person	11	10
Evaluation Unit	5	6
Other	2	1

It is significant that use of annual evaluations is associated with designation of Title I coordinators as handlers of evaluation, since this group typically has fewer staff and dollar resources than the other groups.

Use of Computers

All but nine states reported using computers to help them complete their evaluation activities. The use of computers as a function of staffing is shown in Table 4.

Table 4
Use of Computers in Evaluation as a
Function of Evaluation Staff

Evaluation Staff	Use of Computers No	Yes
Title I coordinator	4	10
Staff Person	5	16
Evaluation Unit	0	11
Other	0	3

As evident from the table, all of the states with evaluation units reported using the computer to help in evaluation.

Of the thirteen states receiving the minimum amounts for state administration ($225,000), five of them reported not using computers in evaluation, and four of these had evaluation managed by Title I coordinators with help from their staff. The remaining four states had moderate to large amounts of administrative funds ($600,000 to $1,000,000) and larger staffs.

Thus, the states not using computers in evaluation tended to be small in terms of staffing and dollar resources available to them.

Presence of computers did not appear to be related to time of implementation of TIERS, since computer use was divided evenly among those states that reported implementing TIERS prior to 1978 and among those states reporting implementation after 1978.

Access to Assistance Provided by Regional Offices

Seventeen states reported having regional offices. The number of states reporting offices is shown in Table 5 as a function of staffing.

Table 5

Regional Offices as a
Function of Evaluation Staff

	Presence of Regional Offices	
Evaluation Staff	No	Yes
Title I Coordinator	12	2
Staff Person	10	11
Evaluation Unit	7	4
Other	3	0

It was hypothesized that presence of regional offices in a state would facilitate the process of providing evaluation assistance to LEAs. The data from Table 4 suggest that, if this hypothesis is borne out by the data, the states having evaluation units or designated staff persons managing evaluation have a greater chance of being more active in helping their districts implement the evaluation provisions and in providing evaluation assistance to them. While this hypothesis will be explored in depth in the last section of this chapter, it appears that the presence of regional offices does contribute to increased levels of particular evaluation activities and that staffing patterns also tend to be associated with differing levels of particular evaluation activities.

Specifically, more often than not, states in which Title I coordinators are given responsibility for evaluation tend to be less active than other states with more differentiated staffing patterns.

Use of Other Resources

If level of evaluation activity differs as a function of evaluation staff, that is, resources, the question was raised as to whether these states with fewer resources might take greater advantage of other resources provided to them that do not depend on state agency organizations or on Title I administrative funds. Two types of resources are examined here: the use of TACs and the use of evaluation materials provided by ED, federal contractors, or other states.

A variable was created that reflected the number of ways states indicated that their TACs had helped them: for example, to implement the evaluation models, to improve programs, to implement the sustaining gains provisions, and so on. TAC usage as measured by the variable ranged from 0 to 4. "Low" TAC use was subsequently defined as a score of 2 or less; "high" TAC use was defined as a score of 3 or more.

It was hypothesized that states with small staffs, especially ones that may not be specialized in evaluation, might be more likely to utilize TAC services than those with larger, more technically sophisticated staff. While the extent of TAC use was not related to any of the staffing or allocation variables discussed here, there was a tendency for the greater users of TAC services to have fewer SMSAs with populations over 25,000 and over 100,000. While TAC use did not vary as a function of presence of regional offices, there was a tendency for more of the group of Title I coordinators to be greater users of TAC services as shown in Table 6.

Table 6

Use of TAC Services as a
Function of Evaluation Staff

	TAC Use	
Evaluation Staff	Low	High
Title I Coordinator	5	9
Staff Person	10	11
Evaluation Unit	8	3
Other	2	1

Coordinators were not as likely to avail themselves of materials that were produced by other sources. Use of several types of evaluation materials was examined--use of the Policy Manual, User's Guide, RMC Technical Papers on the TIERS system, TAC-produced materials, and materials produced by other federal, state, and local sources. As shown in Table 7, states having staff persons designated to handle the evaluation responsibility were more likely to utilize these other materials.

Table 7

Use of Other Evaluation Materials as a Function of Evaluation Staff

Evaluation Staff	Number of Other Resources Reported 0 - 3	4 - 5
Title I Coordinator	7	7
Staff Person	7	14
Evaluation Unit	7	4
Other	3	0

Use of these other materials did not relate to presence of regional offices.

Summary

It is apparent that greater dollar resources available to states may enable them to purchase more staff and to use computers more to assist in their evaluation efforts. The larger states also tended to have regional offices, which are available to facilitate their work with districts.

While the states with fewer resources were expected to utilize other resources more to compensate for their smaller or less technical staffs, the data only slightly supported this notion in terms of TAC use. An interesting observation, namely that states with fewer resources tended to conduct annual evaluations, might tend to corroborate the idea of compensation: states requiring districts to evaluate annually might have to spend less time assisting districts to conduct the evaluations (which may require larger staffs). Greater time may be spent by these states in processing the data received, which may not be dependent on having large numbers of staff or travel funds or regional offices.

Other Factors that May Affect Evaluation Activities

Evaluation practices were also examined as a function of two other factors: (a) the importance placed by the coordinators on the evaluation provisions included in P.L. 95-561, and (b) the percentage of time reported by the coordinators that was spent in evaluation activities.

Importance Ratings

Coordinators were asked whether the evaluation provisions contained in Section 124(g) and the sustaining gains provision included in Section 124(h) were of "little or no," "moderate," or of "substantial" importance in meeting the purposes of the Title I law. While most of the coordinators (N = 38) rated the provision on evaluation as having "substantial" importance, fewer than one-half of them (N = 19) rated the sustaining gains provision as having "substantial" importance in meeting the purposes of the Title I law. It was hypothesized that states giving higher importance ratings to evaluation, especially to the sustaining gains provision, would be more likely to be active in the area of evaluation than states that felt evaluation was of "little or no" importance.

While this notion is perhaps, simplistic, some evidence exists to support the idea (see further discussion in the next section of this chapter). Table 8 illustrates this point by presenting the number of sustaining gains activities reported by states as a function of the importance placed on the provision.

Table 8

Number of Sustaining Gains Activities Reported as a Function of Importance[a]

Importance of Sustaining Gains	Number of Sustaining Gains Activities Reported 0	1	2
Little or No Importance	3	2	5
Moderate Importance	1	7	9
Substantial Importance	2	9	8

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[a] Data from three states are missing.

As suggested by Table 8, a greater proportion of states rating the sustaining gains provision as having "moderate" or "substantial" importance tended to report no activity in this area.

Another way in which importance of evaluation was examined was as a function of staffing configuration. If states designated staff persons or evaluation units to handle evaluation, it was hypothesized that they might rate the evaluation provision in Section 124(g) as being of higher importance than those that chose not to specialize the evaluation responsibility. This relationship is presented in Table 9.

Table 9

Relationship between Evaluation Staffing and Importance Ratings[a]

Evaluation Staff	Importance Rating for Evaluation Provision Little or No	Moderate	Substantial
Title I Coordinator	0	4	10
Staff Person	1	3	16
Evaluation Unit	0	0	10
Other	0	1	2

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[a] Data from two states are missing.

While most coordinators tended to rate the provision as having substantial importance, it is significant to note that those states with evaluation units and the two other states having outside contractors conduct evaluations all rated evaluation as having substantial importance.

Time Spent in Evaluation Activities

The Title I coordinators were asked how much time they and their staffs actually spent in evaluation-related activities across all of their state responsibilities, such as approving applications, monitoring, providing technical assistance, and so on. They were also queried about how much time they would like to spend on evaluation. Overall, state staffs spent about 15 percent of all staff time on conducting evaluation activities. While the percentages of time reported decreased as a function of the staffing pattern, namely less time was reported when the evaluation functions were farther removed from the Title I unit, these differences may not be real but due to a lack of knowledge on the part of the coordinators about how much time these other individuals actually spend on evaluation activities.

It was hypothesized that states conducting more activities to improve the quality of their data might be more likely to report spending more time on evaluation. A rating of quality control was constructed that was based on the extent to which states followed the guidelines of the models, trained their districts on how to implement TIERS, and the extent to which the states checked their statewide summaries for errors in computation, score conversions, and so on prior to submission to ED. This rating was obtained from a combination of sources--a review of TAC reports, ED review reports, in addition to the interview data collected as part of this study. The amount of time spent as a function of these ratings is shown in Table 10.

Table 10

Time Spent in Evaluation as a
Function of Number of Quality Control Activities

Quality Control Rating	Median Percentage of Time Reported Actual	Ideal
Low	10.0	15.0
High	15.0	15.0

While the states rated as paying more attention to quality control activities also tended to spend more time on evaluation, it is interesting that these states tended, on the average, to be satisfied with the greater amount of time spent. The states receiving low ratings tended to report wanting to spend more time on evaluation activities than they have in the past.

An examination of the ratings by the amount of time spent by each type of evaluator shows that the Title I coordinators receiving high ratings in the area of quality control were reporting that they spent approximately 20 percent of their staff time on evaluation. These states indicated that they would like to spend less time on evaluation in the future. This was the only staffing group that wanted to spend less time on evaluation activities in the future. Since these coordinators, as a group, also tended to evaluate annually, the greater amounts of time reported might be lessened if they opted to evaluate using a three-year cycle. Frequency of evaluation was considered to be an indirect measure of evaluation importance, since fewer resources available to states might have made adoption of a three-year evaluation cycle quite attractive.

Another indirect measure of evaluation importance was onset of TIERS implementation. Implementation of the models was considered controversial as noted initially in this section, in that it represented federal involvement in the area of evaluation, which was not universally accepted by all states. Thus, this fact must be taken into consideration when evaluation practices are interrelated with this measure. Another factor that may have delayed implementation is lack of resources. If states perceived that implementation of TIERS needed many staff and greater computer resources, only those with existing resources may have attempted to implement the system before it was actually required. In other words, implementing TIERS only after its mandate in 1978 may be due not to a perceived low importance of evaluation but to a perceived unimportance of federal involvement and to fewer resources.

An examination of the onset of TIERS implementation as a function of evaluation staff is shown in Table 11. As evident from this table, Title I coordinators tended to implement TIERS only after its mandate in 1978. Since the coordinators generally had fewer resources and tended to favor nonfederal involvement, the major reasons for a later implementation are difficult to determine.

Table 11

Onset of TIERS Implementation as a Function of Evaluation Staff[a]

Evaluation Staff	Onset of TIERS Implementation Pre 1978	Post 1978
Title I Coordinator	5	9
Staff Person	8	9
Evaluation Unit	4	5
Other	2	0

[a] Data from seven states are missing.

Summary

Two other factors that are known to influence state evaluation activities were introduced: the importance placed on the evaluation provisions and the percentage of time spent in conducting evaluation activities. These factors will be examined again in the next section of this chapter, when specific evaluation activities are discussed.

Interrelationship of Resources and Attitudes on State Evaluation Practices

Because attitudes--whether positive or negative--toward program improvement were so pervasive, this theme was selected as the focus for the discussion of evaluation practices. The discussion in this section will be organized around four major questions:

- What resources and activities differentiate states with an attitude of compliance/accountability from those having program improvement attitudes?
- What factors differentiate states with emphasis on improving the quality of their data from those that do not?
- What factors affect the extent to which states use data to improve programs?
- What factors affect the extent to which states help districts examine gains sustained over time?

Program Improvement vs. Compliance Attitudes

The belief that evaluation serves primarily program improvement purposes was not shared equally by all evaluation staff as shown in Table 12.

Table 12

Program Improvement/Compliance Attitudes
as a Function of Evaluation Staffing Patterns

	Evaluation Staff			
Attitude	Title I Coordinator	Staff Person	Research Unit	Other
Program Improvement	5	6	2	3
Both	8	11	4	0
Compliance/Accountability	1	2	4	0

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[a] Data from three states are missing.

As shown in the table, the states in which the Title I coordinators and staff persons were managing evaluation tended to favor both program improvement and accountability attitudes, while those with research units tended to report strong feelings that evaluation was to serve national accountability first, or to meet the requirements of the law, and only then was program improvement considered. In fact, three of the five states expressing the strongest views that evaluation was only important in meeting the requirements of the law were in the group of states reporting use of research units to conduct evaluation.

Several reasons may exist to account for the extreme compliance, or perhaps anti-program improvement attitudes expressed by the research units. First, to implement TIERS well, states felt that much emphasis must be placed on better testing procedures and tighter quality control. These activities may take so much time that not enough time is left to devote to program improvement. One state that felt strongly that the purpose of evaluation was to meet the requirements of the law proudly indicated that all of its LEAs had adopted the models and were evaluating in a manner consistent with TIERS, that their testing procedures were better, and that their data were of better quality. However, this same coordinator also admitted that he felt the entire TIERS operation removed all flexibility from evaluation practices. In his words,

> We spend so much time filling out forms we can't do any real evaluation activities.

Despite the fact that his evaluation unit (as opposed to his immediate staff) aggregated all of the data and did all of the needed quality control checks, it was still his responsibility to ensure that the districts implemented the provisions correctly.

What is interesting about the comments of this state and the four others that expressed so much of a compliance attitude is that all of them but one received the lowest rating on activities carried out to ensure quality control. Thus, while these coordinators were expressing concerns over the amount of time necessary to do a good job at implementing TIERSs, the independent ratings of their efforts on this area do not support these attitudes.

Another reason why the coordinators in states with research units may be expressing such compliance attitudes may be the fact that, since they began implementing TIERS prior to 1978, they have been unable to interest their districts in any program improvement activities. In the words of this coordinator:

> Time and money have been spent on evaluation since 1978, yet schools don't use the data much to improve programs. The programs generally stay the same every year. NCEs are hard to figure out; people don't know what they mean.

Since program improvement activities were not popular in that state, the coordinator, perhaps out of frustration, appeared to have adopted a compliance philosophy.

The seven coordinators characterized as having compliance evaluation attitudes in general are striking as a group, because they were not at all active in the area of evaluation, despite the fact that all but one rated evaluation (Section 124(g)) as having substantial importance. For example, a high proportion of them did not encourage their districts to conduct program improvement activities, nor did any of them conduct many activities to help their districts improve programs. They did not conduct or encourage any use of formative evaluations, nor did they try to use TIERS in a formative way. They did not change their evaluation procedures after 1978 to emphasize better quality control or better testing procedures nor did they report making their evaluation systems more standardized or computerized as a result of the 1978 mandate, despite the fact that most of them only implemented TIERS after 1978. They were not at all likely to report using the TAC to help districts improve programs or to implement sustaining gains activities, despite the fact that they tended to be somewhat active in the area of sustaining gains. Approximately one-half of them felt that such activities should be left up to the districts. They also did not report using the application approval or the monitoring processes to ensure that districts implemented these activities. Despite the lack of evaluation activities, these coordinators seemed satisfied with the amount of time spent on evaluation.

While the compliance attitude group tended to be inactive in almost all areas of evaluation, the group expressing both program improvement and accountability attitudes tended to be the most active group. Comparisons on a few key variables are shown in Table 13. Basically, all of these coordinators encouraged their districts to use data to improve programs and were extremely active in this area themselves, they encouraged formative evaluations and tried to use TIERS in a formative way, they emphasized quality control and good testing procedures, they tended to implement TIERS prior to 1978, and they actively used the TAC to help their districts improve programs. They also used both the application approval and monitoring processes to ensure that districts meet their requirements. While they tended as a group to be split between high levels of activity in the area of sustaining gains and no to minimal activities in the area, they were active users of TAC services in this area. While they were generally positive about both a state and a federal role in evaluation, they expressed some frustration over the fact that the TIERS data may not be useful at the local levels. This feeling may have led, in part, to their dissatisfaction with the amount of time that they spent on evaluation; the group generally wanted to spend less time on evaluation in the future. Despite the fact that they tended to evaluate using a three-year cycle, the complex sampling plans that were drawn up and followed coupled with training of the districts that are next to submit data plus aggregating the data previously collected all are intensive activities that require much time and effort on the part of the coordinators.

What is surprising from Table 13 is that the program improvement emphasis states are a mixture of activity levels. While they tended to encourage their districts to use data to improve programs, they did not actively engage in many state-level activities in this area, nor did they rely on the TAC to assist in this area. While they were active in encouraging formative evaluations, they are not likely to report using TIERS data in a formative way, because they feel that TIERS data are not useful at the local levels. They tended to implement TIERS after the 1978 mandate and indicated they would like to spend more time on evaluation in

Table 13

Relationships between Program Improvement/Compliance Attitudes and Evaluation Activities

Attitude	Encourages Data Uses		Number of State-level Data Uses Activities		Use of Monitoring or Appl. Appr. to Ensure Data Uses		Use of TAC to help Using Data		Onset of TIERS Implementation		Emphasis on Quality Control/Good Testing		Use of Formative Evaluations		Use of TIERS Data in Formative Way		TIERS Data Not Useful at Local Levels		Number of State-Level Sustaining Gains Activities			Use of TAC to Help Sustaining Gains	
	No	Yes	Low	High	No	Yes	No	Yes	Pre78	Post78	No	Yes	No	Yes	No	Yes	No	Yes	0	1	2	No	Yes
Program Improvement	2	14	14	2	8	8	13	3	4	9	14	2	4	12	15	1	13	3	1	6	9	13	3
Both	0	23	7	16	8	15	15	8	13	8	10	13	7	16	18	5	19	4	5	7	11	15	8
Compliance/Accountability	4	3	6	1	6	1	7	0	2	5	5	2	6	1	7	0	7	0	1	5	1	7	0

the future. Despite the apparent strong negative feelings toward use of the models and the lack of emphasis on quality control and good testing procedures, they were not any less likely to engage in activities to improve the quality of their data than those with more positive feelings.

What is surprising about the description of the program improvement emphasis states is the high positive feelings about the use of data to improve programs but the lack of follow-through in this area. Not only did these states tend not to be active in evaluation, but they were less active generally considering their other management responsibilities. For example, these states made very few rules in general, and made very few rules to help districts design quality programs in particular. When they did make rules, a large proportion of them tended to make rules solely in response to federal requests. These states tended not to monitor actively for quality of service--in fact, monitoring for most of this group was primarily for compliance purposes. This group also did not feel that monitoring leads to improvement in program quality. From the earlier discussions, one might expect that lower levels of monitoring for quality of service are also associated with lower levels of technical assistance. This is, in fact, the case here: the group of program improvement states is evenly split on reports of conducting workshops, statewide workshops, or working directly with LEAs. Since parent involvement activities and attitudes have been positively related to certain technical assistance activities and quality monitoring efforts, it was expected that the program improvement states might therefore hold more negative attitudes toward parent involvement. The data also confirm this expectation.

This description of the program improvement states is interesting, because it suggests that a group of states that espouse program improvement attitudes in evaluation, which one might consider synonymous with a "quality" attitude discussed in this report, are also the same states that were found to have more "compliance" attitudes in other areas, such as monitoring, technical assistance, or parent involvement. Table 14 presents a comparison of the evaluation program improvement vs. compliance attitudes with attitudes and activities in these other areas.

It can be seen from this table that the states with attitudes that evaluation serves both program improvement and accountability purposes are the "quality" states described in other chapters of this report: the ones that monitor actively for compliance and quality of service; they are the active rulemakers, especially in the area of program quality; they adopted the three-year application cycle and were satisfied with it; they tended to engage in more personalized types of technical assistance activities; they tended to have very positive attitudes toward parent involvement and tended to do lots of state-level parent involvement activities.

The "compliance" evaluation states are intermediate between these other two groups: they are more evenly split among high and low uses of rulemaking, they are split on satisfaction with use of the three-year cycle, they have less positive attitudes toward parent involvement, they do more of both personalized and impersonalized technical assistance

Table 14

Evaluation Attitudes as a Function of Attitudes and Activities in Other Areas of State Responsibility

Attitude	Rulemaking: Number of Quality Design Rules Made: Low	Rulemaking: Number of Quality Design Rules Made: High	Rulemaking: Rule Influence: SEA	Rulemaking: Rule Influence: SEA/LEA	Rulemaking: Rule Influence: LEA	Rulemaking: Rule Influence: Federal	Monitoring: Monitoring Attitude: Quality	Monitoring: Monitoring Attitude: Both	Monitoring: Monitoring Attitude: Compliance	Monitoring: Numbers of Quality Monitoring Activities: Low	Monitoring: Numbers of Quality Monitoring Activities: High	Monitoring: Numbers of Compliance Monitoring Activities: Low	Monitoring: Numbers of Compliance Monitoring Activities: High	Monitoring: Monitoring Leads to Program Quality: No	Monitoring: Monitoring Leads to Program Quality: Yes
Program Improvement	15	1	5	3	0	5	0	5	9	14	2	12	4	12	5
Both	13	10	12	4	4	0	4	16	3	8	15	10	13	8	15
Compliance/ Accountability	4	3	5	0	0	0	1	3	1	1	6	3	4	2	5

Attitude	Application Approval: Three-year Cycle Use: No	Application Approval: Three-year Cycle Use: Yes, No Paperwork Reduction	Application Approval: Three-year Cycle Use: Yes, Paperwork Reduction	Parent Involvement: Attitudes toward Parent Involvement: Positive	Parent Involvement: Attitudes toward Parent Involvement: Less Positive Towards Councils	Parent Involvement: Attitudes toward Parent Involvement: Anti-Councils	Parent Involvement: Attitudes toward Parent Involvement: Anti Parent Involvement	Parent Involvement: Numbers of State-level Parent Involvement Activities: Low	Parent Involvement: Numbers of State-level Parent Involvement Activities: High	Technical Assistance: Meet LEAs Face-to-Face: No	Technical Assistance: Meet LEAs Face-to-Face: Yes	Technical Assistance: Conduct Workshops: No	Technical Assistance: Conduct Workshops: Yes	Technical Assistance: Conduct Statewide Workshops: No	Technical Assistance: Conduct Statewide Workshops: Yes
Program Improvement	5	4	6	1	5	8	2	7	9	7	9	7	9	7	9
Both	7	4	10	2	15	6	0	6	17	4	19	6	17	11	12
Compliance/ Accountability	3	2	2	1	3	3	0	3	4	1	6	0	7	2	5

activities, and they actively monitor for quality but do not actively monitor for compliance.

It appears from these discussions that for only about one-half of the states, namely those with both program improvement and accountability attitudes, were the evaluation provisions implemented to their fullest at the state level. Many of the program improvement states felt the models represented too much federal intrusion into their "local control" attitudes, and hence were not active users of TIERS. Nor were they active in program areas that they felt were in the purview of their districts. The compliance states, on the other hand, were unable to see that the TIERS system could be used for anything but national or state accountability or to meet the purposes of the Title I law; hence they did not engage in these activities. But these compliance states believed that monitoring led to improvements in program quality; hence, they were active monitors-- not in all areas--but in the area of monitoring for quality of service. In a few cases, the compliance states admitted regretting this attitude, but they felt unable to change the direction in which the evaluation thrust of the state was moving.

What do these findings suggest about implementation of such a complex requirement? First, that, while most states will attempt to implement the requirement, the most complete (and perhaps successful) implementation will be attempted by those states that believe in all of the purposes of the provision and that believe the originators of the provision had a right and a role to play by placing it in the law. If states believe that only some of the purposes can be met, for example accountability, they are likely to emphasize only the activities that meet these purposes and be less active in other areas. If states believe that the originators had no right to rule on program improvement or on rulemaking because of their local-state control attitudes, the level of their activities in these areas will be affected accordingly. What is interesting about these evaluation attitudes is that equal numbers of the program improvement, accountability, compliance, and both program improvement and accountability attitudes engaged in high or low numbers of activities to improve the quality of their data. Thus, despite the fact that some states felt strongly that the TIERS system was not useful, they still worked to improve the quality of their data. The same finding was observed in the chapter on Parent Involvement, in which states with extremely negative attitudes towards parent involvement also engaged in several parent involvement activities.

Quality Control

A high number of quality control activities was associated with a high reliance on computers and an emphasis on quality control and good testing procedures, as was expected, but it was not the case that high ratings were associated with an early implementation of TIERS. States doing many quality control activities also attempted to computerize or standardize their evaluation activities after the mandate in 1978. They tended to use a three-year evaluation cycle, and these states were also high users of TAC services.

Improving the quality of data as reflected by these ratings is associated with attitudes that evaluation fosters the development of strong evaluation designs and that evaluation leads to program improvement. These states did not generally feel that evaluation served accountability purposes nor did they conduct evaluations simply to be in compliance with the law.

More quality control activities generally occurred when a staff person was assigned; presence of regional offices was also related to more quality control activities.

A comparison of these quality control emphasis states with attitudes about evaluation and other areas is shown in Table 15.

One thread that appears to run through the emphasis on quality control is that these states tend to be active in enforcement--they spend more time on approving applications, monitoring, and withholding of funds than do those states with fewer quality control activities.

States with high ratings on quality control tended to spend more time on evaluation and less time on parent involvement than those with low quality control ratings. They also had more negative attitudes toward parent involvement, PACs in particular, and tended not to engage in many state-level parent involvement activities. They were also less likely to indicate an emphasis on parent involvement as part of their technical assistance activities. Since these states were clearly going to great lengths to implement the evaluation requirements, their lack of attention to parent involvement was not felt to be part of a less attentive management style. A closer look at the responses of these states to the parent involvement interview questions shows that the negative attitudes of these states clustered around two themes: the parent advisory council membership and election requirements were extremely difficult to implement and parent involvement should not be legislated but left up to state and local option.

As noted before, this latter view of federal-state roles was also distributed throughout the evaluation attitudes. Since parent involvement may be considered more of a "local" activity than is evaluation, it is not surprising, perhaps, that these attitudes would manifest themselves so prominently in the area of parent involvement.

High numbers of quality control activities were not related to higher levels of quality monitoring. It had been expected that these states might have used active monitoring efforts to ensure that attention was paid to quality control activities at the local level. This, apparently, was not the case.

States that did not conduct many quality control activities tended to do evaluation primarily for compliance purposes or because evaluation was important for accountability. Despite the fact that they believed evaluation was a good management tool, especially for troubleshooting to ascertain needs for technical assistance, they were not likely to feel that evaluation led to program improvement.

Table 15

The Relationship between Quality Control Activities and Other State-level Activities

Number of Quality Control Activities	Evaluation															
	Title I Coordinator	Staffing Pattern Staff Person	Staffing Pattern Evaluation Unit	Other	Presence of Regional Offices		Use of Computers in Evaluation		Computerized System after 1978		Evaluation Frequency		Emphasis on Qual. Cont./ Good Testing		Evaluation is for Compliance Only	
					No	Yes	No	Yes	No	Yes	Annual	3-years	No	Yes	No	Yes
Low	10	7	6	2	17	7	8	16	23	1	15	9	18	7	20	4
High	4	14	5	1	13	11	1	23	20	4	13	11	13	11	23	1

Number of Quality Control Activities	Evaluation (continued)								Monitoring				Parent Involvement			
	Evaluation is for Accountability		Eval. Fosters Strong Evaluation Designs		Use of Data to ImprovePrograms		Good Management Tool		Number of Quality Monitoring Activities		Number of Compliance Monitoring Activities		Parent Involvement Attitudes			
	No	Yes	No	Yes	No	Yes	No	Yes	Low	High	Low	High	Positive	Less positive PACs	Anti-PACs	Anti-Parent Involvement
Low	10	14	24	0	16	8	13	11	12	13	13	12	3	16	4	1
High	16	8	21	3	9	15	19	5	14	10	15	9	1	8	13	0

Number of Quality Control Activities	Parent Involvement (continued)			
	Number of Parent Involvement Activities		More Emphasis on Parent Involvement in Technical Assistance	
	Low	High	No	Yes
Low	14	10	20	5
High	19	5	21	3

These states also tended to conduct annual evaluations. This view appears slightly inconsistent with a compliance stance, since it was thought that a three-year cycle might have been sufficient to achieve compliance. However, since large numbers of this group were active in the area of monitoring and technical assistance, perhaps an annual evaluation cycle was "easier" to explain to large numbers of districts. It may also be that states that feel the sole purpose of evaluation is for accountability purposes might feel that an annual evaluation cycle is critical to meet this need.

As stated earlier, a quality control emphasis is not related only to the notion that receipt of valid data yield valid aggregations and lead to better program decisions. While it is true that the six states with the highest quality control scores espoused this view and that the four states with the lowest scores did evaluation solely to meet the requirements of the law, there were many other states in between that had different views. Some states that felt strongly about evaluation serving national accountability purposes, which were to justify the program to Congress, did not conduct a high level of activity to improve the quality of their data. One might have expected these states to now spend more time to improve their data quality to facilitate federal decisionmaking. On the other hand, several states that did several quality control activities apparently became disillusioned with the usefulness of the data and wondered what purposes their efforts would serve.

Use of Data to Improve Programs

Forty-three coordinators indicated that they felt the use of evaluation data (not limited to TIERS) to improve programs was important and that they encouraged their districts in this area. The remaining six coordinators reported either no or minimal encouragement of their districts in this area. The types of activities conducted by the state coordinators in the area of using data to improve programs are varied as shown in Table 16.

Table 16
State-level Data Utilization Activities

Activity	Number of States
Lots of technical assistance provided to LEAs	17
Evaluation results reviewed with LEAs	22
Comprehensive feedback reports given to LEAs on various aspects of their evaluation results	10
LEA outliers (high or low gains) examined to determine cause of problems	20
Monitoring process used to ensure LEAs include program improvement activities	17
Application process used to ensure LEAs include program improvement activities	18
Statewide gains reviewed to identify factors associated with successful programs	8

The interrelationships among these data uses are shown in Table 17.

Table 17
Tetrachoric Correlations Among Data Utilization Activities[a]

	Lots of Techn. Asstnce A.	Reviews Results B.	Feedback C.	Looks at Outliers D.	Monitoring E.	Application Approval F.	Statewide Reviews G.
B.	.451						
C.	.742	.605					
D.	.416	.615	.507				
E.	.162	.323	-.093	.416			
F.	.386	.259	.062	.227	.511		
G.	.261	.085	.348	.355	.261	.421	

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[a] Correlations of approximately .4 or greater are statistically significant at the p = .05 level.

From this table, several trends are apparent:

- Four activities are highly interrelated with each other: lots of technical assistance, reviews evaluation results with LEAs, provides feedback to LEAs on their evaluation results, and SEA looks at data outliers to detect problems.

- Two other activities are also highly interrelated: the use of the monitoring and application approval processes to ensure that districts use their evaluation data in some way to improve programs.

The interrelationships among these activities and the important evaluation functions (shown in Table 1) is presented in Table 18. From this table it can be seen that the group of four data utilization activities noted previously tend to be interrelated with accountability attitudes, attitudes that evaluation fosters strong evaluation designs, program improvement attitudes, and attitudes that evaluation serves as a good management tool. It is also the case that use of monitoring or application approval to ensure inclusion of program improvement activities is inversely related to compliance attitudes. Furthermore, the use of application approval is positively correlated with use of evaluation as a management tool to improve programs and use of evaluation as a link with program planning.

A measure of data utilization activities was constructed summing across the four items mentioned above, since they tended to be interrelated with each other and with positive attitudes toward evaluation. These items are:

- SEA provides large amounts of technical assistance to LEAs,

- SEA reviews results with LEAs individually or in small groups,

- SEA provides comprehensive feedback reports to LEAs on various aspects of their evaluation results, and

- SEA looks at LEA outliers to identify problems.

Sixteen coordinators reported none of these activities, fourteen reported one, seven reported two, seven reported three, and five reported all four of these activities.

Table 18

Tetrachoric Correlations among Data Utilization Activities and Evaluation Purposes[a]

Data Utilization Activities	Evaluation Purposes									
	Compliance 1.	Develops Support Base 2.	Accountability 3.	Fosters Strong Evaluation Designs 4.	Valid Data in Aggregations 5.	Link with Program Planning 6.	Objective Assessments 7.	Improve Programs 8.	Management Tool 9.	Need for Technical Assistance 10.
A. Lots of Tech-Assistance	.081	.377	.451	.402	-.321	.243	-.244	.093	.068	-.149
B. Review Results	-.071	.181	.273	.276	.326	.026	.184	.520	.390	.408
C. Feedback	.336	-.060	.092	.601	-.083	.075	-.251	.198	-.054	-.167
D. Looks at Outliers	-.327	.089	.615	.326	.384	.110	-.566	.286	.596	.126
E. Monitoring	-.445	.034	-.088	-.019	.238	.082	-.487	.230	.217	.213
F. Application Approval	-.469	-.595	-.011	-.046	-.379	.492	-.515	.420	.565	.183
G. Statewide Results	-.164	-.242	-.341	.286	.008	.208	-.157	.639	.489	.170

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[a] Correlations of approximately .4 or greater are statistically significant at the p = .05 level.

Low levels of data utilization activities are associated with the assignment of evaluation to the Title I coordinator as shown in Table 19.

Table 19

Extent of Data Utilization by Type of Evaluation Staff

Evaluation Staff	Extent of Data Utilization Low (0-2)	High (3-4)
Title I Coordinator	10	4
Staff Person	11	10
Evaluation Unit	6	5
Other	2	1

Since many of these states with evaluation managed by Title I coordinators were also the program improvement states described earlier, the lower levels of activity are not unexpected. This relationship is shown in Table 20.

Table 20

Data Utilization Activities as a Function of Evaluation Attitude[a]

Evaluation Attitude	Extent of Data Utilization Low	High
Program Improvement	15	2
Both	7	16
Compliance/Accountability	6	1

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[a] Data from two states are missing.

As expected from the earlier discussion, only the states with both program improvement and accountability attitudes report doing more activities to help their districts use data to improve their programs.

Data utilization activities appear to be facilitated by the presence of regional offices as shown in Table 21.

Table 21

Data Utilization Activities as a Function of Regional Offices

Presence of Regional Offices	Extent of Data Utilization Low	High
No	20	11
Yes	10	8

Since many of these offices are used extensively to provide technical assistance to districts, their involvement in evaluation is not unexpected.

Thirty Title I coordinators indicated that they or their districts utilized some type of formative evaluation procedures in their states. The intent was often to supplement the summative evaluation results provided by TIERS with more periodic formative, data. Six states specifically mentioned, however, that they encouraged their districts to use their TIERS data in a formative way.

Use of formative evaluations is found among both data utilization activity levels. The use of TIERS data in a formative way, however, is reported primarily by the states that are active in helping districts in data utilization as shown in Table 22.

Table 22

Formative Evaluation Efforts as a Function of Data Utilization

Extent of Data Utilization	Use of Formative Evaluations (Not Limited to TIERS) No	Yes	Use of TIERS Data in a Formative Way No	Yes
Low	14	16	29	2
High	5	14	14	4

Even though the higher group of data utilization tended to use TIERS more often in a formative way, they were equally as likely to implement TIERS prior to 1978 as after. The lower levels of data utilization, however, tended to implement TIERS after 1978.

High levels of data utilization are also associated with an emphasis on quality control and good testing procedures (but not higher numbers of quality control activities), high levels of helping districts implement the sustaining gains provision, and slightly higher use of TACs. Since these states tended to be those with both program improvement and accountability attitudes, which were shown to be associated with high levels of "quality" activities in other areas, it is not unexpected that the high data utilizers were also active rulemakers, especially rules to help districts design quality programs; they tended to initiate rules themselves or in conjunction with their districts; they were active monitors for quality of service and compliance; they had more positive parent involvement attitudes and did more parent involvement activities.

The relationships among these data utilization activities and several technical assistance activities are shown in Table 23.

Table 23

Relationship among Evaluation Data Utilization Activities and Technical Assistance Activities

Extent of Data Utilization	Use of Workshops		Statewide Workshops		Meet with LEAs		Help LEAs Plan Face-to-Face		Help LEAs Manage Face-to-Face	
	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes
Low	11	19	11	19	11	19	14	16	21	9
High	3	16	11	8	3	16	6	13	7	12

This table shows that high levels of data utilization are correlated with all personalized and face-to-face interactions with LEAs and inversely with the use of less personalized statewide workshops. The lower level data utilizers tend to utilize all kinds of general workshops and meetings with LEAs, but are less likely to help LEAs with specific kinds of activities--for example, helping them manage their programs and, to a lesser extent, helping them with the planning of their programs.

It appears that those states that reported using the application approval process to ensure inclusion of program improvement activities by locals were successful in doing so as shown in Table 24.

Table 24

Use of Application to Ensure Program Improvement

Use of Application to Ensure Program Improvement	Rating of Application on Inclusion of Program Improvement Requirements		
	Absent	Insufficient	Sufficient
No	23	3	5
Yes	5	3	10

Greater numbers of states reporting use of the application to ensure program improvement were, in fact, more likely to request a sufficient amount of information on this requirement in their applications than were the other states that did not report using the application in this way. In comparison, the level of program improvement activities reported had no relationship to successful use of the application as evidenced by the ratings made by this study.

Sustaining Gains

LEAs appeared to be encouraged to implement the sustaining gains provisions in 41 of the states. In eight states, the LEAs were either not encouraged or left up to their own to implement the provisions. The provision was actually implemented at the time of the interviews in 40 states; 2 states said they had no plans to implement the provision at all; the remaining states planned to implement the provision some time in the future.

State activities in the area of sustaining gains took several forms. First, SEAs provided technical assistance to their LEAs to help them implement it and either followed up to see that the provision was implemented (N = 14) or did not follow through (N = 2). Second, SEAs required their LEAs to have plans for implementing the provision to be available for inspection during monitoring visits but did not collect them (N = 25) or they did collect and approve the plans on the application (N = 10). Third, SEAs conducted a sustained gains study on a statewide basis or else collected the data from all or a sample of their districts so that they would analyze the results at the state level (N = 8). Fourth, twelve states indicated that they used their TACs to help them provide assistance to their districts in implementing the provision.

Implementation of the provision was facilitated by the presence of regional offices and by the designation of a staff person or an evaluation unit to handle evaluation responsibilities as shown in Table 25.

Table 25

Sustaining Gains Activities as a Function of Available Resources

Number of Sustaining Gains Activities	Presence of Regional Offices		Evaluation Staff			
	No	Yes	Title I Coordinator	Staff Person	Evaluation Unit	Other
0	7	0	5	1	1	0
1	9	11	3	12	4	1
2	15	7	6	8	6	2

Reports of no sustaining gains activities were associated more often with having the Title I coordinators responsible for evaluation than when other staff were assigned.

Higher levels of activity in the areas of sustaining gains were also associated with the collection of a sufficient amount of information on the district application to ensure that LEAs were implementing the provision as shown in Table 26.

Table 26

Relationship between Sustaining Gains Activities and Ratings of Application

Number of Sustaining Gains Activities	Application Rating on Sustaining Gains		
	Absent	Insufficient	Sufficient
0	5	1	1
1	8	9	3
2	11	2	9

Approximately one-half of the applications did not collect any information on this provision. However, no state-level effort in this area was associated with the collection of no information in this area of the application.

The sustaining gains provision occasioned many negative comments by the coordinators. Many felt it was a ridiculous requirement; others felt that the law lacked enough "teeth" to drive state action in this area. Still others resented the fact that their districts were required to implement the provision over which they had no role. Since LEAs were not required to report the results of these studies to SEAs, some states felt at a disadvantage in even discussing the activities with them.

It is interesting that the five states with strong compliance views all reported some or high levels of state activity in this area as shown in Table 27.

Table 27

Number of Sustaining Gains Activities and Compliance Attitudes toward Evaluation

Number of Sustaining Gains Activities	Evaluation is for Compliance Only	
	No	Yes
0	7	0
1	18	2
2	19	3

Nine of the twelve states that reported using their TACs to help implement the provision tended to be the most active in this area. It was therefore not the case that inactive states relied on their TACs to implement a provision that they did not like simply for the sake of complying with the law.

Changes

The most significant change made by coordinators to their evaluation systems as a result of the 1978 Title I law was the implementation of TIERS. This change was reported by 23 states. Nineteen coordinators indicated that they had already been implementing the models prior to their mandate in 1978.

While implementation of the models prior to 1978 was believed initially to be an indicator of the importance of evaluation, it has been noted repeatedly throughout this chapter that other extenuating factors may also have been involved. In addition to consideration of dollar resources and staff time to implement, state organizational structures were also important. For example, as shown in Table 28, the presence of regional offices is more likely to be associated with an implementation of TIERS after 1978.

Table 28

Onset of TIERS Implementation as a Function of Regional Offices[a]

Presence of Regional Offices	Onset of TIERS Pre 1978	Onset of TIERS Post 1978
No	15	12
Yes	4	11

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[a] Data from seven states are missing.

Thus, it may have been difficult politically for some of the large states to mobilize early to implement such a system that was, perhaps, perceived to be complex and that might not ever be mandated. It may have been easier for some of the states with non-decentralized functions to move quickly; and the data tend to support this idea. Some states, especially large ones that already had an evaluation system in place that they felt was working, waited to implement TIERS until the mandate forced them to do so. A few felt the change meant a loss of face for them in front of their districts, particularly with the replacement of the favored grade equivalent scores with a new and unknown metric (NCEs). For others, the delays of several larger states in implementing TIERS even after 1978 were viewed by smaller states as exercising their "political muscle" to test the strength of the mandate and ED's strength to enforce the mandate.

An examination of the state characteristics of "early" vs. "late" implementers shows that early implementers are characterized by a greater percentage of local contributions to state educational revenues and more LEAs, while late implementers are characterized by a greater percentage of state contributions to state educational revenues, larger amounts of Title I administrative funds for state administration, and larger Title I staffs. Thus, many of the late implementers tended to be the larger states.

Table 29 presents a listing of all of the changes to evaluation practices mentioned by the coordinators.

Table 29

Changes to Evaluation Practices as a Result of 1978 Law

Change	Number of states Reporting
Adoption of TIERS	23
Emphasis on quality control/ good testing procedures	18
Computerized/perfected TIERS after 1978	17
Other	
• Increase in level of effort	6
• Evaluation integrated with other state/federal programs	3
• Emphasis on formative procedures	2
• Integration of evaluation with program design	2
• Analysis of data--not just collection or reporting	2
• Change in evaluator	3

Those states that reported a greater emphasis on quality control tended to be the states with both program improvement and accountability attitudes as noted earlier. The fact that they also conducted higher levels of quality control activities tended to corroborate their activities in this area. More emphasis on quality control was also associated with higher levels of TAC support. In fact, many of these states reported that they could not have implemented the TIERS system without help from their TACs.

There was also a tendency for states implementing TIERS after 1978 not to report a greater emphasis on quality control.

More emphasis on quality control and good testing was also associated with greater numbers of program improvement activities and reports that the monitoring or application approval processes were used to ensure program improvement as shown in Table 30.

Table 30

Relationship between Greater Emphasis on Quality Control and Program Improvement Activities

Greater Emphasis on Quality Control/Good Testing	Number of Program Improvement Activities		Use of Application Approval or Monitoring	
	Low	High	No	Yes
No	23	8	18	13
Yes	7	11	6	12

It appears that the more active states in the area of program improvement were more likely to use direct services, as measured by the number of state-level activities in the area of program improvement, as well as indirect activities, as measured by the use of the application approval process, for example, to achieve this goal.

Problems

Approximately one-half (N = 24) of the coordinators reported having problems with some aspect of the evaluation provisions. A listing of the problems reported is presented in Table 31.

Table 31

Reports of Evaluation Problems

Problem	Number of States
TIERS/models difficult to understand	8
Testing, including costs, increased	6
Paperwork increased	5
Form completion focus, not evaluation anymore	4
Concern about effectiveness of TIERS including NCEs	4
TIERS data not useful at local level	3
Time consuming, too much effort	3

Table 31 (continued)

Reports of Evaluation Problems

Problem	Number of States
Interpretation problems with small samples	2
Technical problems with the models	3
LEAs/SEAs not sophisticated enough to handle implementation	2
Staffing/contractor problems	2
Strong negative reaction	2

Because of the varied nature of these problems, and, perhaps because they essentially stem from TIERS implementation, states reporting problems did not differ in terms of the population, allocation, and staffing variables discussed earlier.

Reports of evaluation problems were associated with states where evaluation units were responsible for evaluation. One reason for this finding may be that, since many states with evaluation units waited to implement the TIERS system until after the mandate in 1978, their problems were due to attempting to install the system in a rather short time period. As shown in Table 32, more research units that implemented TIERS after 1978 reported problems, while no such relationship existed with staff who implemented the system prior to 1978. In fact, one state with an evaluation unit indicated that its major problem was "meshing the Title I system with the system already used in our state for the state compensatory education program."

Table 32

Relationship between Problems Reported by Evaluation Units and Onset of TIERS Implementation

Evaluation Staff	Pre-1978 Problems		Post-1978 Problems	
	No	Yes	No	Yes
Title I Coordinator	2	3	4	5
Staff Person	4	4	7	2
Evaluation Unit	2	2	0	5
Other	1	1	0	0

Two other state Title I coordinators indicated that their problems lay with the evaluation units themselves. In the words of one,

> Our evaluation unit is so picky about getting clean data that the data are two years old before we get them. We can't encourage districts to make program decisions with that kind of data.

Less frequent evaluations, that is, use of the three-year evaluation cycle, were associated with more problems than on annual cycle, despite the fact that annual cycles were expected to involve more work. One state commented that

> Trying to keep track of schools that don't do well when they report gains every several years is extremely difficult.

Problems with frequency of evaluation, however, were more likely to be reported by coordinators who had implemented TIERS prior to 1978 as shown in Table 33.

Table 33

Relationship of Problems with Evaluation Frequency and Onset of TIERS Implementation

	Pre-1978 Problems		Post-1978 Problems	
Evaluation Frequency	No	Yes	No	Yes
Annual	7	4	6	7
Three-year	2	6	5	5

One coordinator who had been an early implementer of TIERS strongly believed in an annual cycle:

> Just when you get everyone trained to use the models and good testing procedures, the law comes along and says you don't have to evaluate every year. If some districts have a hard time remembering good evaluation procedures from one year to the next, how can you expect, especially with turnover at the districts, that they will remember for three years until the next time they report data?

Reports of encouragement of formative procedures, and particularly encouragement of the use of TIERS data in a formative way, were also associated with a greater incidence of problems. Since TIERS data were felt by some not to be useful at the local level, and since others felt that NCES were difficult to understand and hence to use, this finding is not unexpected. Coordinators who implemented TIERS after 1973 were more likely to report problems as shown in Table 34.

Table 34

Relationship of Problems with Formative Procedures and Onset of TIERS Implementation

Use of Formative Procedures	Pre-1978 Problems No	Pre-1978 Problems Yes	Post-1978 Problems No	Post-1978 Problems Yes
No	2	3	7	3
Yes	7	7	4	9

While reports of problems did not differ as a function of the extent of program improvement activities conducted, the absence of other activities tended to be associated with problems. For example, more problems were reported by states conducting no sustaining gains activities. Similarly, states not collecting any information on their applications pertaining to evaluation effectiveness, sustaining gains, or program improvement also tended to report problems. In this latter case, collecting information regarding data uses for program improvement on the application was associated with reports of no problems. These relationships are shown in Table 35.

Table 35

Relationships between Low Levels of Evaluation Activities and Reports of Problems

	Number of Sustaining Gains Activities			Evaluation Ratings								
				Effectiveness			Sustaining Gains			Program Improvement		
Presence of Problems	0	1	2	Absnt	Insuf	Suf	Absnt	Ins	Suf	Absnt	Ins	Suf
No	1	11	11	0	18	5	9	8	6	9	2	12
Yes	6	7	11	2	10	6	13	4	5	17	4	3

The relationship of problems to the use of TAC services presents an unexpected finding as shown on Table 36.

Table 36

Reports of Problems as a Function of TAC Use[a]

Presence of Problems	Extent of TAC Usage Low	 High
No	14	9
Yes	9	15

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[a] Data from two states are missing.

It had been expected that high TAC usage would result in fewer problems reported by states. However, just the opposite relationship was observed. One reason for this finding may be that states did not feel the need to utilize their TACs until they encountered problems. An examination of each of the problems reported as a function of TAC use shows that higher levels of TAC use were associated with reports of only two problems, but both of these involved additional burdens placed on states--greater testing and more attention paid to forms completion rather than evaluation. Apparently TACs were called upon to offer several kinds of assistance to solve these types of problems. First, technical advice and assistance was provided by TACs to help solve the testing problems; for example, TACs provided states with statistical corrections to enable districts to select students on the pretest using model A1. To solve the forms completion problem, TACs were given credit for helping states revise their data collection forms to facilitate collection of the information from local school districts and for providing states moral support "to carry out the ridiculous paperwork problem" caused by the reporting requirements.

A re-examination of the problems listed in Table 31 shows that the problems can be clustered into two major categories--problems centering around the technical aspects of the TIERS system and problems focusing on the paperwork and testing burdens caused by the new reporting requirements. It had been hypothesized that the types of problems reported might differ as a function of onset of TIERS implementation. Specifically, states implementing TIERS prior to 1978 were expected to report more problems related to the technical aspects of TIERS, while the late implementers were expected to report more negative feelings and problems less related to the models. Unfortunately, the small numbers of states reporting each type of problem are small, which makes drawing such conclusions difficult. However, the data suggest:

- Problems of too much paperwork and that TIERS was too time consuming were reported only by the early implementers. Some technical problems, such as problems inter preting the gains with small samples and the observation that TIERS data are not useful at the local level, were also only reported by the early implementers.

- Problems with lack of sophistication of state or local staff and problems that TIERS/NCEs were difficult to understand were reported by the late implementers. Only the late implementers expressed extremely negative reactions (e.g., "stupid").
- Reports of increased testing were equally mentioned by both groups.

While it had been expected that states with differing attitudes toward evaluation--program improvement vs. compliance--might have different problems, the data do not confirm this hypothesis. Equal numbers of each group reported problems. While the problems of overtesting and the non-usefulness of TIERS at the local level were reported by the states having both program improvement and accountability attitudes and never by the compliance states, the numbers of states reporting each problem are too small to make many meaningful comparisons.

Problems with evaluation provisions were reported by states during application approval, the provision of technical assistance, monitoring, resolution of complaints, and withholding of payments as shown in Table 37. These problems generally focused on the difficulties states had in explaining the evaluation models and procedures sufficiently to their districts to enable them to implement the provisions and to summarize what they did on the application. To overcome some of these problems during the application approval process, states tried to modify their forms to make it easier for districts to check "yes" or "no" to certain activities rather than require them to write long narratives about their procedures, since oftentimes the narratives would be incomplete or incorrect.

Table 37

Problems Caused by Evaluation Requirements for Other State Responsibilities

State Responsibility	Number of States Reporting Problems with Evaluation (Sec. 124(g))	Sustaining Gains Sec. 124(h))
Application Approval	4	4
Technical Assistance	3	1
Monitoring	4	3
Withholding of Payments	4	0
Complaint Resolution	1	0

State coordinators were asked how the Department of Education helped them to carry out their evaluation activities. While 20 indicated that ED--primarily the division funding the TACs--was extremely helpful, 21 indicated that ED was helpful primarily through provision of the TAC. Only five states indicated that ED was somewhat helpful or that relationships with Ed were neutral. It had been anticipated that a less supportive role from ED might have created problems for states. However, the data suggest that equal numbers of the states reporting helpfulness from TACs or from ED reported problems. Hence, no relationship was observed.

Exemplary Practices

State Title I coordinators were asked whether they had developed any procedures or materials in the area of evaluation with which they were particularly pleased and that could be shared with other states. Thirty coordinators indicated they had developed either exemplary procedures (N = 14) and/or materials (N = 25). The types of procedures mentioned most frequently were workshops (N = 4), computerized data collection systems (N = 4), and quality control procedures (N = 2). The materials mentioned most frequently were evaluation manuals or handbooks (N = 6); materials on general evaluation topics, e.g., NCES, models (N = 8); evaluation checklists for use in monitoring (N = 4); materials on technical aspects of the models, e.g., regression effects (N = 4); and audiovisual materials (N = 3). Only five states cited specific materials that they produced with TAC assistance; many others, however, admitted that they could not have developed the exemplary items that they mentioned without the support and assistance received from their TACs.

Exemplary practices were reported more often by coordinators who were active in evaluation--they started implementation of the models prior to 1978, they were active in the area of sustaining gains, they were active in helping their districts improve programs, and they were active in encouraging and utilizing formative evaluation efforts, as shown in Table 38.

It is also significant that states that did not collect any information on their applications concerning evaluation issues tended to report development of exemplary materials. Since the application does not appear to be the "watch dog" for evaluation activities, states may have become more active in these areas to compensate for not using the application in this way.

Exemplary practices were not related to a number of factors that played important roles earlier in this chapter--presence of regional offices, type of evaluation staff, presence of problems, or the extent to which ED provided assistance to states. They were also not related to how much time was spent on evaluation or how many staffing dollar resources that were available.

Table 38

Production of Exemplary Practices as a Function of Evaluation Activities

Presence of Exemp. Practices	TIERS Implementation		Number of Sustaining Gains Activities			Number of Program Improvement Activities		Use of Formative Evaluations		Evaluation Ratings								
										Effectiveness			Sustaining Gains			Program Improvement		
	Pre-1978	Post-1978	0	1	2	Low	High	No	Yes	Absent	Insuff.	Suff.	Absent	Insuff.	Suff.	Absent	In-Suff.	Suff.
No	3	9	3	6	5	12	15	9	5	0	4	3	7	4	3	7	1	6
Yes	15	12	4	10	16	2	15	8	22	3	20	7	14	6	10	18	4	48

States with both program improvement and accountability attitudes were more likely to report production of exemplary practices as shown in Table 39.

Table 39

Production of Exemplary Practices as a Function of Evaluation Attitude[a]

Evaluation Attitude	Exemplary Practices No	Yes
Program Improvement	7	8
Both	3	18
Accountability/Compliance	4	3

---

[a] Data from six states are missing.

A closer look at the states with accountability attitudes shows that they tended to develop processes, such as workshops, quality control procedures, or computerized data collection efforts, rather than materials.

Production of processes rather than materials was also more likely to be associated with greater TAC assistance as shown in Table 40.

Table 40

Production of Exemplary Processes and Materials as a Function of TAC Use

TAC Use	Exemplary Processes		Exemplary Materials	
	No	Yes	No	Yes
Low	21	5	11	14
High	15	9	13	11

This finding was not unexpected, since some of the computerized data collection systems, workshops, and quality control procedures were technical enough so that they might not have been developed by the states without TAC help. States were apparently not as dependent on their TACs for help with developing materials, perhaps in part, because they had been developing materials to help their LEAs for many years.

It was hypothesized that states not developing exemplary practices of their own, especially materials, would be more likely to utilize materials produced by other sources. In this case, usage of materials produced by ED, the contractor that developed the models, and materials produced by other sources, such as TACs and states, were examined as a function of materials development. States with or without materials or processes were equally as likely to use these other resources. While there was a slight tendency for states producing no materials to use more of these other resources than states producing some materials of their own, this relationship was not pronounced.

Continuation

At the end of the evaluation section of the interview, states were asked whether they would continue to monitor if there were no or minimal legal requirements for them to do so. Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As part of the interviews conducted onsite to a representative sample of 20 states, state-level personnel were queried specifically about their continuation plans under Chapter 1. By this time, Chapter 1 requirements were a little better understood, and state coordinators were beginning to make plans as to what aspects of their Title I practices would or would not be included as part of Chapter 1 management.

The discussion on continuation plans is presented in two parts. The speculative answers provided by the 49 Title I coordinators during the telephone interviews will be summarized and interpreted first. The information obtained from the 20 state Title I coordinators in response to specific probes about their plans to evaluate under Chapter 1 will be presented next.

Evaluation Plans: A Speculation

The answers of the coordinators to the theoretical question, whether they would continue to monitor if it were not expressly required by law, are summarized in Table 41.

Table 41

Evaluation Continuation Plans

Plan	Number of states	
• Don't know	2	
• Yes (plans unspecified	9	
• Similar to current practice	22	
- Continue using the TIERS evaluation models		18
- Emphasize data utilization		10
- Include formative procedures also		5
- Include sustaining gains		3
• Modified practices	8	
- Less rigorous use of TIERS models		6
- Rely more on formative evaluation procedures		5
- Less rigorous evaluation procedures generally		3
- Other		
: Delete Model B		1
: Delete sustaining gains		1
• Different practices	5	
- Rely mainly on informal non-structured evaluation approaches		1
- Trade off measurement rigor with practical data collection, even if rigor suffers		1
- Use national sampling studies to collect achievement data for ED		3
- Do not require LEA reports to the SEA or SEA reports to ED		5
- Include as part of evaluation for other state/federal programs		4
- Have LEAs primarily responsible for evaluation		3

From the table it is apparent that most state coordinators indicated a preference for continuing evaluation procedures that were fairly similar to current practices. A common reason why states wanted to continue using the evaluation models, was in their words, "if it ain't broke, don't fix it." These states felt that a lot of time and effort had gone into implementing the system and working out the "bugs" in it and that the system had not had a chance to prove itself--either positively or negatively. Thus, until some evidence to the contrary was obtained to force them to change, for example to discontinue the models, they opted to continue in the future as they had in the past.

Continuation plans of states were related to the amount of resources available to them. States reporting similar practices (particularly use of the models) tended to be large in terms of total allocations, total state revenues, numbers of LEAs, numbers of large SMSAs over 25,000, and over 100,000, and numbers of staff available to assist with the evaluation effort. Since greater resources were available to the states with evaluation units, it is not surprising that more states with this staffing tended to be more likely to report continuation of the models.

Those states wanting to continue using similar evaluation procedures were also the ones that were very active in technical assistance (as evidenced by reports of more technical assistance methods) and more time spent on technical assistance and not active in the area of parent involvement (as measured by the lesser amount of time spent in this area). They also wanted to spend more time in the future on evaluation activities, while the other groups did not.

Continuation of the models was reported by the more active states: those implementing the models prior to 1978, helping their districts improve their programs but not those more active in the area of sustaining gains, those more active in including evaluation items in the application--as shown in Table 42. Also shown are the negative relationships with parent involvement--namely less positive feelings about the councils--that were noted in earlier discussions of this chapter.

Continuation of the models was not related to the amount of TAC assistance received or to how frequently the evaluation was conducted--both of which had been expected to make a difference. It may be that, while active states were interested in continuing the models, continuation may be more affected by the amount of dollar and personnel resources available to states than outside factors, such as the extent to which TACs or ED were perceived as helpful.

States' plans to emphasize data utilization in the future were related to an early implementation of TIERS, both program improvement and accountability attitudes, and the nonuse of evaluation units. It is interesting to observe that those states utilizing their TACs less frequently were more likely to want to emphasize data utilization more in the future. These relationships are shown in Table 43.

It was, at first, surprising that more of the states with a program improvement attitude were not vocal about emphasizing data utilization in the future. As noted before, many of these states were interested in evaluation with more local options. Thus, if districts wanted to spend more time on data utilization they could--but it was not for the states to require them to do so. In the words of several coordinators:

> Evaluation is necessary and should be used as a tool for program improvement by locals. The law should eliminate the rigors LEAs must go through to accomplish that goal.
>
> Evaluation is very important and useful. I would like to see it be more of a local option. Have LEAs use evaluation for program improvement.

Table 42

Continuation of the TIERS Models as a Function of Evaluation Activities

	Onset of TIERS Implementation		Nos. of Program Improvement Act.		Extent of Sustaining Gains Activities			Evaluation Ratings									Parent Involvement Attitudes			
								Effectiveness			Sustaining Gains			Program Improvement						
Use of Models	Pre-1978	Post-1978	Low	High	None	Some	Active	Absent	Insuf.	Suf.	Absent	Insuf.	Suf.	Absent	Insuf.	Suf.	Positive PACs	Less Positive PACs	Anti-PACs	Anti-Par. Involvement
No	9	15	24	7	1	5	12	2	24	5	17	6	8	20	3	8	3	16	8	2
Yes	10	8	6	12	6	15	10	1	11	6	7	6	5	8	3	7	1	8	9	0

Table 43

Future Emphasis on Data Utilization as a Function of Evaluation Activities

Emphasis on Data Utilization	Evaluation Staff			Onset of TIERS Implementation		Evaluation Attitude			TAC Use	
	Title I Coordinator	Staff Person	Evaluation Unit	Pre-1978	Post-1978	Program Improvement	Both	Compliance/ Accountability	Low	High
No	11	16	10	11	8	14	16	6	18	21
Yes	3	5	1	21	2	2	7	1	7	3

Thus, these coordinators were not anti-program improvement or anti-data utilization, but they did not view this role as one played by states.

Seven of the ten coordinators who wanted to emphasize data utilization more in the future also conducted high levels of quality control activities. For these coordinators, they did feel that the good data received from TIERS would allow them to make better decisions on program issues in the future. Comments made by these coordinators include:

> NCEs have really helped us and our districts to be accountable. With the NCEs we have really unified the program--we can now make program decisions at federal, state, and local levels.
>
> We have spent more than three years to implement TIERS--now we have really good data. In the future, we [and the LEAs] should learn to use it to improve their programs.

Overall, the states reporting continuation along similar lines reported fewer problems than those states wanting to change their evaluation activities as shown in Table 44.

Table 44

Continuation Plans as a Function of Problems[a]

Continuation Plans	Presence of Problems No	Presence of Problems Yes
Similar/Yes	21	10
Modified	1	7
Different	0	5

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[a] Data from five states are missing.

Most of the 12 coordinators reporting problems and wishing to change their practices felt that the burdens placed on them by too much testing or by too much paperwork or by too many TIERS requirements made their lives much more difficult than they wanted. They perhaps wanted to alleviate these problems by spending less time in the future on evaluation activities.

While all saw evaluation as an important function, they disagreed as to whether they or their districts should be responsible for evaluation. Some coordinators who wanted to play an active role felt that too much effort had been misplaced, which made their jobs very difficult. In the words of several coordinators:

> TIERS has led to the situation where the tail is wagging the dog.
>
> We are only evaluating what's measurable, not the learning process of children. You can now report to Congress better, but not plan programs better.

For these coordinators, less structure (and less validity) was easier to administer. For others with similar statements, less structure was better, becuse it placed the responsibility of evaluation back on the LEAs where it belonged. Other states wanted to have evaluation a prominent feature, but some wanted to coordinate evaluations of Title I and their state compensatory education programs.

Thus, each of these "change" groups reported similar problems with the evaluation requirements, but they differed on how they planned to resolve them.

Evaluation Plans: Preliminary Views of Chapter 1

During subsequently conducted interviews with a sample of 20 states, the Title I coordinators and their evaluators (where appropriate) were probed specifically about their evaluation plans under Chapter 1. So that their comments can be placed in perspective, a summary of their past evaluation activities is included in Table 45. As evident from the table, the 20 states in the national sample tended to be very active in the area of evaluation. Thus, it is of particular interest to determine how these states planned to continue evaluating their programs under Chapter 1, since the models are no longer required.

The issue of whether to continue to evaluate using one of the evaluation models was perhaps of greatest concern to personnel in all 20 states. While only 8 states had indicated initially specific plans to continue using the models, at the time of the follow-up interviews 12 states reported plans to continue using the models. Another five reported either "we would like to but we are not sure if our Chiefs (or LEAs) will let us;" another four remained uncertain.

Part of the uncertainty over whether states could require districts to use the evaluation models stemmed from language provided in the Summary of Regulatory Provisions in the Chapter 1 Regulations (29 July 1982) that:

> It should be emphasized that the provisions in Subpart C reflect the new flexibility provided under Chapter 1. For example,...although Section 200.54 requires an LEA to evaluate its Chapter 1 project, it is not required to use any particular evaluation models.

Table 45

National Sample of 20 States: Description of Test Evaluation Activities

Variable	Number of States
• Staff	
-Title I coord.	4
-Staff person	11
-Evaluation unit	5
• Use of Computers	
-No	2
-Yes	18
• Frequency	
-Annual	9
-Three-years	11
• Formative Procedures	
-No	1
-Yes	16
-Use of TIERS data in a formative way	3
• Number of Quality Control activities	
-Low	11
-High	9
• Evaluation Attitude	
-Program Improvement	6
-Both	11
-Compliance/ Accountability	3
• Onset of TIERS	
-Pre 1978	10
-Post 1978	8
• TAC Use	
-Low	10
-High	10
• Extent of Program Improvement Activities	
-Low	12
-High	8
• Attempts to Use TIERS Data to Impr. Pgms	
-No	5
-Yes	13
• Extent of Sustaining Gains Activities	
-None	1
-Some	10
-Active	9
• Presence of Problems	
-No	9
-Yes	11
• Presence of Exemplary Practices	
-No	3
-Yes	15
• Initial Continuation Plans[a]	
-Don't know	1
-Similar/Yes	13
:Continuation of Models	8
:Emphasis on data uses	3
-Modified	3
-Different	3

---

[a] Data collected during initial telephone interviews

While states recognized that no models were to be mandated by ED, it was not clear whether states could exercise their rulemaking authority granted to them by the Regulations to require that their districts use the evaluation models. Furthermore, while the law empowered states to collect whatever information as may be required for program evaluation consistent with the reponsibilities of the state agency under Chapter 1, most of the states indicated that they were unsure what their role was in the area of evaluation. Equally unclear was the federal role; if ED no longer required states to submit data in a common metric for national aggregations to Congress, then why should states make such requests of their districts?

Evaluators in 14 of the states were also interviewed about plans for implementation of evaluation under Chapter 1. It is interesting to note that, in seven cases, the continuation plans voiced by the evaluators matched those advocated by the coordinators; in four cases the continuation plans expressed by the evaluators were very tentative and generally less strong than what the Title I coordinator indicated; and in three cases, the plans advocated by the evaluators were stronger and much more definite than those expressed by the Title I coordinators. Most of the disagreements focused over whether the models would (or would not) be used; whether NCEs (or grade-equivalent scores) would be used; and whether all or a sample of districts would be required to report data to the state.

Specific continuation plans focused on the following types and combinations of activities:

- primary reliance on the models as in the past (N=9);
- use of the models as before but with the substitution of grade-equivalent scores for NCEs (N=2);
- no reporting from LEAs to SEA or from SEA to ED (N=2);
- modified use of the models--that is, aggregate the data from Chapter 1 with other similar state and federal educational programs for special needs populations (N=3);

---

[6] According to Table 45, 16 of these states had evaluators. One state no longer had an evaluation unit at the time of the follow-up interview. This loss was apparently due not to Title I budget cutbacks, but to decisions made internally by that state department that had nothing to do with Title I evaluation issues. The evaluator in the other state was not available to be interviewed.

- Use of the models as before for accountability plus use of formative evaluation procedures for program improvement (N=4);

- use of models on a sampling basis of LEAs or schools (N=2);

- greater reliance on informal evaluation procedures as opposed to the models (N=1);

- meet with a task force comprised of state and local personnel to decide what evaluation activities to include (N=3).

The themes running throughout these continuation plans are the same ones that have emerged throughout all of the discussions in this chapter; namely evaluating for accountability vs. program improvement purposes; and defining the role of ED, the states, and the districts in evaluation. Typical comments regarding the accountability vs program improvement issue are:

> Congress still needs to know what is happening. We will continue using the models for accountability purposes and encourage formative evaluation procedures for looking at program quality.
>
> We will keep on reporting data to the Feds--if we didn't, Congress would say, "we don't know what you are doing" and then cut the dollars.
>
> We need to know if our districts are succeeding and in what degree, so we will not change our procedures. We will not report to the Feds, though, since it is not required.
>
> We will continue as we have been, but we will increase our "process" evaluation efforts.
>
> We will continue to use the models but will go back to the use of grade-equivalent scores at the local level, since LEAs can better use them in their local decision-making.
>
> Accountability to Congress and to the public are the main reasons we want to continue using the models.
>
> We will do some kind of evaluation in the future--one of the best aspects of the current system is that it allows Ed to collect data on a national level. We will also hope to do more in the area of tieing evaluation results back to program quality--we have not done enough of this yet.

Typical comments regarding the proper role of ED, SEAs, and LEAs in evaluation are:

> Congress still has a right to know what is happening in Chapter 1. We will recommend continuation of the models but we may not be able to do it if LEAs pressure us not to.
>
> We will meet with our LEAs to decide exactly what should be done in evaluation.
>
> The state is trying to follow the intent of the law by not requiring the districts to implement the models, although it would like to. However, the hope is that, if you leave the LEAs alone, they will continue using the models, and they will stop only if you put other options or alternatives in front of them.
>
> We are powerless to require our districts to use the models, since they are not required by law.

Ten of the states indicated that they anticipated problems in carrying out their chosen evaluation plans under Chapter 1. The major problems centered around the reduction in activities caused by shortages of staff or dollars (N=6) and the uncertainties over continuing the models or TIERS requirements if they are not specially required by law (N=5). Comments made by the coordinators regarding the effects of reduced budgets are:

> With cutbacks in funds, we will lose our evaluator. We may also not have the dollars to continue doing the extensive processing of district data using the state computer.
>
> Shortage of dollars means shortage of staff. Shortage of staff means we can't/won't be able to do more than informal evaluation checks.
>
> With shortage of staff, we cannot monitor LEAs as often. LEAs may try to hide illegal activities under the guise of "positive" evaluation results so as to avoid being monitored as often. We will not have the staff to check all the information LEAs provide.

Comments made by the coordinators regarding the issue of what evaluation activities can be carried out if not specifically permitted by law are:

> We will keep a low profile--LEAs will keep on doing what they always did (i.e., the models) unless told to do otherwise. If we are challenged, we will have to work out options with the LEAs.
>
> We can't report any data to the Feds, since none are required.

> We will try to continue using the models but may have to stop if we get resistance from our districts.
>
> The state is trying hard to implement the intent of the law by not requiring much from LEAs. What this means is that the state no longer will require districts to evaluate using a test that has "good" norms. Next year we will probably see lots of data submitted from non-normed tests, which means we may not be able to aggregate our data statewide using NCEs.
>
> What if an LEA refuses to evaluate using the models? How can we force them to?
>
> We can no longer point to the law as the reason to evaluate. We will have to rely on persuasion instead of enforcement.

The 14 evaluators who were interviewed were also asked what strengths and weaknesses they saw in Chapter 1 regarding the evaluation provision. Only five evaluators cited any strengths, and all five cited the increased flexibility of the new law and the greater options in evaluation afforded to states and locals. Typical comments include:

> It is good to have local options again.
>
> Good to have more state and local flexibility. It may even encourage the state to do more rulemaking so it (rather than the Feds) can actually be in charge of the program.
>
> Flexibility is good--it will lead to more creative evaluation designs.
>
> The new law is good for evaluation, since it eliminated the requirement that states must report to the Feds--this eliminated the collection of much evaluation data that were not used at the state (or even federal) levels.
>
> Control was returned back to the states as it should be, but the emphasis, on objective measures and sustained gains, is not different. This is as it should be also.

Again, as was evident in earlier discussions, not all states that wanted more flexibility wanted the federal role to disappear as evidenced by the last comment presented above.

Not unexpectedly, many states saw the afore-mentioned strengths of the Chapter 1 law as weaknesses. Thirteen states reported weaknesses in the law. These weaknesses concerned too much flexibility, including lack of clear federal, state, and local roles (N=9); loss of accountability and lack of paperwork reduction (N=7); and not enough emphasis on formative evaluation efforts for program improvement (N=3).

Comments concerning too much flexibility, which also relates to lack of clarity of federal, state, and local roles, include:

> There is no clear federal or state role specified in Chapter 1. What exactly can states require as far as evaluation is concerned?
>
> LEAs will now be able to do anything they want to--the state will have no control over this. The best the state can hope for is that LEAs will make a commitment to their own evaluation activities instead of doing it for compliance only.
>
> The new law is far more restrictive than before--the rules are not specific enough for use and the LEAs to know exactly what we should be doing. Had the new law at least defined the purposes of evaluation, some of this ambiguity might have been lessened.
>
> We still need assistance from ED in the area of relevant research findings to help improve programs. Is this still possible if there is no role for ED?
>
> The program will be more difficult to administer because of a lack of guidance in evaluation.

Loss of accountability and concern over the lack of paperwork reduction was mentioned as a weakness by seven coordinators. A sampling of their comments includes:

> Data flow upward has been weakened. Data should be having a more prominent position in decisionmaking in troubled times. Data have been of little use to state and federal policymakers historically--they will be even of less use under P.L. 97-35.
>
> Credibility of evaluation is important. Without it, now, ED will be lost.
>
> Evaluation results are needed to save the program in Congress.
>
> The law is supposed to have lessened paperwork, but it won't. It leaves LEAs more vulnerable because of no monitoring provisions. LEAs will "get caught" during audits. This is especially true for evaluation, since LEAs must evaluate and there are no guidelines to help. Thus, more paper trails are needed to document what was done in case of future audits.
>
> Paperwork reduction under Chapter 1 is a fallacy. The new legislation has less accountability than before, which is not really good as far as evaluation. No one really knows what is supposed to be done.

> The new law is so open it will take us back to situations where we cannot make comparisons. This may cause both destruction of TIERS and demise of the program.

Not enough emphasis on formative evaluations was expressed by three states. A sampling of their comments includes:

> Process evaluation should be built into the legislative language to help improve programs.
>
> No real emphasis on formative evaluation is included in Chapter 1. This lack of emphasis has been missing from all Title I laws since the program's inception.
>
> A definition of the purpose of evaluation would have been helpful. Since evaluation has never been useful at the local level, this might have forced LEAs to improve their programs.

It is clear from both the telephone interviews with the 49 states and from the onsite follow-up interviews to a sample of 20 states that evaluation is an extremely important and useful function. However, states disagree as to the appropriateness of the federal role--that is, whether national accountability should be a focus of a state's evaluation effort. States are also unclear as to what their state role should be, especially if ED's role is limited: should states require the models for purposes of state accountability or just for determining program effectiveness at the local levels? If ED no longer has a role to collect data, should they send data to ED anyway or collect data and keep it locally with the hope of sending it to ED at some later time when requested? Finally, should states require anything more of their districts, whether it be models or uses of data to improve programs, if these activities are not required by law?

If states are uncertain about whether or not they want to play the "heavy" with their districts in asking them to evaluate using certain activities, they may decide to turn to the TACs for help in this area. They also may need to rely more on the TACs or on free assistance provided to them from local sources (e.g., universities) to compensate for the loss of technical staff due to Chapter 1 budget cuts.

One issue related to staffing that may play a part in determining the future staffing configurations in states came from observation onsite and from the interviews with the evaluators. It was noted that different attitudes about evaluation were held by the "program" and "evaluation" staff. Over the years since the TACs were established to help states, it evolved that "technical" TAC staff talked more and more with the states' "technical" representatives and less with their program staff. While this practice may have made good sense in the early years because of the technical measurement issues discussed, the growing emphasis on program improvement and data utilization issues makes this practice seem less attractive. One outcome has been that, in some large decentralized states, no TAC staff ever talks to program staff any more--despite the fact that the program staff develop the district applications that may address evaluation issues and monitor the districts to ensure compliance with the evaluation requirements. While some Title I units have utilized staff in their research units to assist them with these other activities, others did not. In some states, there is little or no communication between the two units, which may exist in different buildings and organizational divisions within the state agency. Thus, evaluation capacity has been built in evaluation units, some of which had no need for it since they began with technically capable staff, and capacity has not been built into the program staffs.

The implications of this situation, namely that different amounts of evaluation knowledge are present in states' program and evaluation staffs, in times of reduced funding are apparent. As noted here, several states indicated they may lose their full-time evaluators. One other with a research unit indicated that the level of effort in the unit would be reduced if funds were cut. In both of these situations, staffing losses mean loss of evaluation expertise to the Title I unit. Since decisions on staffing cuts often rest with the Title I coordinator, several coordinators indicated they would try to "save" staff whom they saw everday and "let go" staff in other units, such as auditing or evaluation, that they saw less often. Thus, the level of evaluation expertise would be decreased significantly in each of these states. Since several of these states had very little communication between program and evaluation personnel, the capacity built up by TACs into these states would be irretrievably lost.

Another factor that will affect future staffing will be the role given to evaluation by the states themselves. In several cases, despite apparent budget reductions, the state agencies had set evaluation as a priority activity for both federal and state programs. In these states, evaluation is not expected to get short shrift, and the evaluators may continue to work with Chapter 1 programs. In other cases, evaluation may not be as fortunate. In states where coordinators feel they cannot do evaluation without a legal mandate and where evaluation is not considered a statelevel activity, they may be forced to let their evaluators go. Thus, these states will not have the advantage of six years of TIERS implementation when they plan their evaluation activities under Chapter 1.

It was obvious from discussions with program staff that a need for evaluation assistance was great; many staff even expressed frustration over what they felt was exclusion from SEA-TAC interactions.

One way in which ED might facilitate the future of Chapter 1 evaluation is to encourage more program-evaluation bridges to be built in states. TACs might be used to encourage sharing of information across units and to include state program staff in their workshops and other assistance provided to states. Where evaluators no longer exist, ED and TACs will be forced to help develop evaluation capabilities anew in these states.

Evaluation: A District Perspective

A sample of 60 districts in the 20 states was asked about their states' evaluation activities to provide an indepth look at this process from a district viewpoint.

Of this sample of districts, 45 (84.9 percent) indicated that they evaluated on an annual basis; only 8 (15.1 percent) indicated that they used a three-year cycle. Almost all of the LEAs (N=54) indicated that they used the norm-referenced TIERS evaluation model (Model A) to evaluate their program.

Since some of the state Title I coordinators had indicated that the TIERS data were not useful at the local level, districts were asked whether they supplemented TIERS with any formative evaluation efforts. A large number of LEAs (N=40, 78.4 percent) indicated that they did some kind of formative evaluations; 11 (21.6 percent) did not. These district responses were interrelated with those of their states to a similar question; the results are shown in Table 46.

Table 46

Use of Formative Evaluation Efforts by Districts and States

District Use of Formative Effort	State Use of Formative Effort No	Yes
No	5	6
Yes	5	35

It is apparent that when districts report use of formative evaluation procedures, their states also reported actively encouraging district efforts in this area.

When districts were asked whether they had implemented the sustaining gains provision, 38 LEAs (73.1 percent) reported that they had; 14 LEAs (26.9 percent) reported that they had not. The responses of districts to this question were interrelated to their states' responses to a similar question; the results are presented in Table 47.

400

Table 47

Implementation of Sustaining Gains Provision by Districts and States

District Sustaining Gains Activity	State Sustaining Gains Activity: No Activity	State Sustaining Gains Activity: Some or Active Activity
No Activity	2	12
Some Activity	1	37

This table suggests that, in states that report no implementation of the provision, districts also tend not to report conducting sustaining gains studies. The districts reporting any activity in this area are located in states that also report active effort in this area. It is interesting to note that 12 LEAs that did report any activity in this area were located in states that were active. One reason for this observation is that several states conducted statewide activities in this area, even if they did not actively enforce implementation of the provision at the local level.

Districts were asked to list ways in which they used evaluation data (formative or summative) to improve their local programs. Fifty-two ways were mentioned by the local coordinators; these responses are categorized as shown in Table 48.

Table 48

Ways in Which LEAs Used Evaluation Data to Improve Programs

Response	Number of Districts Reporting
• Data Used to Change Program	26
- Data showed program weaknesses; summer school begun to help students who regress	
- Data used to eliminate/modify activities/programs not coming up to par	
- Teachers compare notes weekly to see what works and what does not work and change program accordingly	
- Evaluator meets with building principals to look at schools with low gains to see why they are low and how they can improve	
- Teaching strategies are modified on the basis of test scores	

Table 48 (continued)

Ways in Which LEAs Used Evaluation Data to Improve Programs

Response	Number of Districts Reporting
- Data used to look at teacher effectiveness --use the information to change order of classes and to make mini adjustments to instruction throughout the year	
• Data Used to Make Changes to Individual Student Instruction	16
- Individual teachers follow student progress	
- Formative data used to develop student educational plans	
- Test scores used to place students when they come from other states	
- Test scores used to identify learning problems of children	
- Teachers use test scores to graduate students out of the program	
- Teachers use test scores for student diagnosis/individualizing instruction	
• Data Used for General Planning Purposes/ Confirmation of Successful Project Performance	8
- Summative data used to plan program emphasis	
- Data used for overall program planning	
- Program planning and application preparation	
- Evaluation results/sustaining gains studies confirm local efforts	
- TIERS data help in public relations	
- Compare achievement data by schools, grades, teachers	
• Weak Uncertain Use	2
- Review statewide summaries	
- Only districtwide assessment data used to plan, not TIERS data	

This table suggests that local uses of evaluation results to improve programs are quite varied. Only one-half of the districts, however, actually reported using data to make program-level changes as opposed to making changes to instruction on a student level. Thus, the summative outcome data, most often obtained through the use of TIERS, were used to make program-level changes and for general program "planning;" individual test scores and other formative evaluation efforts were used to make changes at the student level.

A similar picture of using data to improve programs emerged when districts were asked what they liked best about their evaluation activities. Of the 62 districts that answered this question, all but nine indicated that what they liked best about the process was the fact that evaluation provided them with good feedback and served as a good planning tool. A sampling of these responses is shown in Table 49.

Table 49

What LEAs Liked Best about Evaluation

Response	Number of Districts Reporting
• Evaluation Provides Feedback/Serves as a Planning Tool	53
- Use of results to improve teaching	
- Helps identify program weaknesses	
- Measures program success	
- Provides feedback for decisionmaking	
- Gives teachers opportunity to see what they accomplished	
- Shows constituency groups that the program is working	
- NCEs are useful/models are accurate measures	
- Serves as another way to monitor program effectiveness	
- Useful for future program planning	
• Positive Feelings about the Process	7
- Liked TAC help	
- Liked SEA assistance	
- Good SEA/LEA relationships resulted	
- Evaluation much simpler than before	
- Liked evaluation workshops	
• Nothing	2

Districts were also asked about what they liked least about their evaluation activities. Their responses are categorized in Table 50.

Table 50

What LEAs Liked Least about Evaluation

Response	Number of Districts Reporting
• Negative Feelings about the Process	25
- Filling out the forms is difficult, because not all information is readily available	
- Lack of statistical training on the part of the personnel completing the evaluation	
- Test administration problems	
- Lack of feedback from SEA on results sent to them	
- Testing at lower elementary school levels is difficult and not valid	
- Requirement to use outside evaluator	
- Sustaining effects studies	
• Evaluation Activities are a Burden	17
- Too time consuming	
- Too much work involved and too little payoff	
- Too much testing of children	
- Too much paperwork	
- Filling out the forms is too tedious (time consuming)	
- Forms completion takes away from teaching time	
• Problems with TIERS, including TACs, NCEs, models, testing requirements	16
- Questions of validity when in-level tests are used for below average children	
- No one understands NCEs/difficult to explain	
- NCEs not useful at local level	
- TAC is deadly dull/too technical	
- Model A testing requirements (separate test for selection and evaluation)	
- Validity of Model A questioned	
• Usefulness of Evaluation Data Questioned	12
- Evaluation does not show complete picture of student growth	
- Problems interpreting the results to know whether the program was successful	
- Since evaluation data sent to SEA are just statistics gathered for the feds, concerns over how these data can be used at local level	
- Test scores may be over interpreted	
- Don't know how to use the data	

The comments shown in Table 50 suggest that at least some districts were interested in improving their programs but were unsure exactly how to do so. TIERS data, and achievement testing to a lesser extent, were not considered useful by a large number of districts. LEAs may have become frustrated, since they did not know what other options were available. They also felt they lacked guidance on how to interpret the data that they had.

When LEAs were asked how helpful their states have been with respect to evaluation, more than two-thirds felt that their states were extremely helpful to them (N=41, 70.7 percent). Eight (13.8 percent) felt the state was slightly helpful, eight (13.8 percent) were neutral about the help they received, and one LEA (1.7 percent) felt that its state had actually hindered it to carry out its evaluation activities.

It was hypothesized that districts may have felt that their states were more helpful to them if their states tended to be more active in helping their districts use data to improve programs. This relationship is presented in Table 51.

Table 51

Perceived Helpfulness of States as a Function of State-level Data Utilization Activities

Perceived Helpfulness of State	State-level Data Utilization Activities	
	Low (0 - 1)	High (2 - 4)
Hindered	0	1
Slightly Helpful	6	2
Helpful	27	14
Neither	2	6

While it is true that the most active states in this area were perceived as being helpful (or at least not a hindrance) by their districts, it is interesting to note that the majority of districts reporting "helpful" states were located in states conducting fewer activities in the area of data utilization.

Since many LEA comments focused on the usefulness of TIERS, helpfulness of the states was examined as a function of the attention the state paid to improving the quality of its state-level TIERS data. This relationship is shown in Table 52.

Table 52

Perceived Helpfulness of States as a Function of Attention to Quality Control

Perceived Helpfulness of State	Number of State-Level Quality Control Activities Low	High
Hindered	1	0
Slightly Helpful	7	1
Helpful	17	24
Neither	7	1

This table clearly shows that the states perceived to be the most helpful are active in working to improve the quality of their TIERS data. As noted earlier, these states believe that evaluation leads to program improvement--they did not believe that evaluation was conducted for compliance purposes only.

The sample of districts was asked, if there were no state or federal rules requiring evaluation, do you think evaluation should be included as part of your district activities? All 58 districts responded affirmatively. The types of evaluation activities districts indicated they would include are:

- pre-post achievement testing (N=10, 20.0 percent),
- TIERS evaluation models (N=15, 30.0 percent),
- testing plus some formative effort (N=14, 28.0 percent),
- reliance on districtwide testing (N=5, 10.0 percent), or
- other general evaluation comments (N=6, 12.0 percent).

There was no relationship between the districts that indicated a preference to continue using the evaluation models and their states' future plans in this area. However, continuation of TIERS models at the local level was more likely to be reported by districts located in states having a staff person assigned to manage evaluation activities and in states that tended to pay greater attention to the quality of their TIERS data. Districts' continuation plans as a function of these state characteristics are shown in Table 53.

Table 53

Districts' Continuation Plans as a Function of State Characteristics

District Continuation Plan	State Evaluation Staff			State-level Quality Control Activities	
	Title I Coordinator	Staff Person	Evaluation Unit	Low	High
Pre-post testing	2	7	1	5	5
TIERS models	2	11	2	4	11
Testing and formative evaluation procedures	4	5	5	10	4
Districtwide testing	2	2	1	1	4
Other	0	3	3	4	2

It is also noted on Table 53 that while inclusion of formative evaluation procedures at the local level are equally likely to occur across all state staffing configurations, they are less likely to occur in states where much emphasis is placed on quality control activities.

Thus, states that spend time to improve the quality of their data are perceived as being extremely helpful to their districts. The state attitudes toward program improvement and using evaluation data to make program decisions may have influenced their districts to continue use of TIERS in the future. It may be that districts located in states that do not try to use TIERS data to their fullest may opt for more formative evaluation procedures, simply because they lack information on how to understand their data.

The recent TIERS assessment (Reisner, et al., 1982) did call into question the usefulness of TIERS for small districts. It may be that an increased knowledge of the basics on how to interpret test scores might be helpful to districts, before they decide to abandon testing or the evaluation models in favor of more reliance on local teacher assessments.

PARENT INVOLVEMENT

PARENT INVOLVEMENT

Chapter Highlights

Parent involvement in Title I programs has evolved from a period when there were no requirements, through a stage when encouragement only was given, to 1978 when very specific stipulations on the nature of parent participation were in force.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to determine what effects this prescriptive piece of legislation had on state administration:

- To what extent did states implement--and help their districts implement--these parent involvement provisions?
- What problems did states encounter in implementing the parent involvement provisions?
- Did the provisions stimulate states to develop exemplary practices in this area?
- To what extent would states plan to continue involving parents if there were no or minimal requirements for them to do so?

The study's major findings include:

- Almost all states felt that parents should be involved in Title I programs in the form of parent participation as described in Section 124 of the 1978 Title I statute.
- Wholehearted support for the involvement of parents in advisory councils as specified by Section 125 of the statute come from only eight percent of the states. The states that tended to favor the councils were those in which the council requirements tended to be more compatible with their own local style of government--the involvement of parents in town councils, for example. The majority of states, however, felt that the goals of parent involvement could better be met with less formalized procedures.
- Attitudes toward parent involvement correlated positively with a quality management style as defined by monitoring actively to ensure program quality and use of personalized technical assistance methods of service delivery.
- States designating a staff person to handle parent involvement activities tended to be more active than states that did not.

- Section 125 (Parent Advisory Councils) created many more problems for state management than did Section 124 (parent participation).

- States with more positive parent involvement attitudes tended to develop exemplary practices or materials.

Most states planned to continue parent involvement under Chapter 1, but they differed as to whether they plan to take an active role at the state level or only encourage their districts in this area. The states assuming a more active role in parent involvement can be characterized as having a "quality" management orientation--they are more active in parent involvement and have more positive attitudes toward it, they actively monitor to ensure both program quality and compliance, and they tend to make rules to help their districts improve their local programs.

Districts generally felt that their states were helpful to them as they implemented the parent involvement provisions of the 1978 Title I law. Districts tended to mirror their states in having mixed feelings about whether councils are a most effective way of involving parents in the program, although almost all districts felt involvement of parents was important to the success of the program. Despite the negative attitudes toward councils expressed by some states, states did not allow these negative attitudes to interfere with their technical assistance roles.

Introduction

Parent involvement in Title I programs has evolved from a period when there were no requirements, through a stage when encouragement only was given, to the situation in 1978 when very specific stipulations on the nature of parent participation in the program were in force. In 1965 when ESEA Title I was first authorized, there was no specific mention of involving parents in the program. However, the desire to have the program accountable to parents and to keep parents informed was a major reason that Congress included evaluation requirements as part of the 1965 legislation. Regulations published in November 1968 (Section 116.18(c)) stated that parents be involved in planning, operation, and appraisal of projects, including their representation on Title I advisory committees that may be established. In 1971, Section 115 of P.L. 91-230 authorized the Commissioner of Education to regulate parent involvement and, in October 1972, regulations were issued requiring district-wide parent advisory councils. In 1974, school parent councils along with district councils were required by law (P.L. 93-380). In the Education Amendments of 1978, two entire sections of the law were devoted to parents. In Section 124, "Parent Participation," parents were permitted to participate in establishing programs; they were to be informed of, and permitted to make, recommendations concerning instructional goals and their children's progress; and parents were to be given opportunities to assist their children in achieving goals. Section 125 of the 1978 Education Amendment focused on "Parent Involvement" in the form of school and district-wide councils, which were responsible for advising the school district in planning, implementing, and evaluating its program. Section 125 is highly specific regarding the methods for the establishment and composition of the councils. Furthermore, district councils were given consent power in two areas of program administration--the establishment of schoolwide projects and use of alternative rankings of eligible school attendance areas.

While Section 124 of the 1978 legislation focused on involvement of parents with their own children and the educational goals of the program, Section 125 established an advisory role for parents in the program. Thus, parent involvement in Title I grew from an encouraged presence to parental oversight of Title I administration at the local level.

There are several reasons for the growing emphasis placed on the role of parents in Title I. Primarily, it is felt that children will benefit if their parents are involved. Parents can contribute information on their children's skills and interests, and can then reinforce educational goals in the home. Parent involvement also serves as a source of pressure to keep local programs directed toward the needs of their children. Parents can serve as a check on state and local actions in administering the programs. Political power to improve school programs often lies with parents in wealthier communties and not with those in poorer ones. Since Title I funds are targeted to low-income areas, a special effort was made to empower parents and ensure that districts accept parents in a decision-making role. A third reason for involving parents in the Title I programs, cited somewhat less frequently, is that the involvement will have beneficial effects on the parents themselves. For example, one parent who testified at the Senate Hearings prior to the reauthorization of Title I in 1978, indicated that, because of her experiences in Title I, she became aware of the importance of education, returned to school, and completed a college degree.

There has also been an emergence of advocacy groups for involving parents in education, particularly the Title I program. These groups believe that parent involvement is essential to a good education program and are concerned that opportunities for parent involvement have not been encouraged by states and districts. There is a National Coalition of Title I parents and numerous other organizations, including the National Coalition for Parent Involvement in Education, the Home and School Institute, and the National School Volunteer Program, among others.

The growing specificity of the requirements came about because of evidence that districts were failing to involve parents in a meaningful way despite the mandate in the legislation (Committee on Education and Labor, 1978).

A major study conducted by System Development Corporation (SDC) under the auspices of ED examined the involvement of parents in four major federally funded programs, including Title I, in 1980 (Melaragno, Lyons, & Sparks, 1981). This study found that high levels of parent involvement at the local level produced valuable benefits to parents, schools, staff, and students. However, despite the legislative mandate in 1974, the operating Title I regulations at that time (made final in 1976), and the recently enacted 1978 Title I law governing the establishment of parent advisory councils, it was observed that meaningful involvement of parents varied widely. Two observations made by the study are of interest here:

- More precise federal legislation and regulations regarding parent involvement could be critical to obtaining more involvement of parents in Title I projects.
- More active involvement of parents in the form of district councils took place in states that developed Title I guidelines for parent involvement and monitored to ensure that the guidelines were implemented.

In 1978, Congress reacted strongly to testimony concerning the lack of parent involvement, and more than two full pages were devoted to parent requirements in the 1978 legislation. In previous laws, this subject was treated in only small unlabeled paragraphs. More specific language regarding an increased management role for states, including expanded responsibilities in the areas of monitoring, approving applications, and providing technical assistance, was also added to the 1978 Title I statute. Implementation of these provisions was apparently not complete at the time SDC collected its data in Spring 1980.

The specificity of the 1978 requirements attempted to standardize a minimum level of parent involvement at the local level. The specifications contained in Section 124 of the law are somewhat general. Section 125 is longer, more explicit, and prescriptive. The text of these sections is presented in Table 1. The major provisions of these sections are summarized briefly in Table 2.

Table 1

Title I Parent Involvement Provisions
in Sections 124 and 125 of Public Law 95-561

Section 124

"(j) PARENT PARTICIPATION.—A local educational agency may receive funds under this title only if parents of children participating in programs assisted under this title are permitted to participate in the establishment of such programs and are informed of, and permitted to make recommendations with respect to, the instructional goals of the program and the progress of their children in such program, and such parents are afforded opportunities to assist their children in achieving such goals.

"SEC. 125. (a) ESTABLISHMENT OF ADVISORY COUNCILS.—(1) A local educational agency may receive funds under this title only if it establishes an advisory council for its entire school district which—

"(A) has a majority of members who are parents of children to be served by projects assisted under this title;

"(B) is composed of members elected by the parents in each district; and

"(C) includes representatives of children and schools eligible to be served by, but not currently participating in, programs assisted with funds provided under this title.

"(2)(A) A local educational agency may receive funds under this title only if it establishes an advisory council for each project area or project school, except as provided in subparagraph (B), which—

"(i) has a majority of members who are parents of children to be served by programs assisted under this title, and

"(ii) is composed of members elected by the parents in each project area or project school.

"(B) In the case of any project area or project school in which not more than one full-time equivalent staff member is paid with funds provided under this title, and in which not more than forty students participate in such programs, the requirements of subparagraph (A) shall be waived.

"(C) In the case of any project area or project school in which 75 or more students are served by programs assisted by funds provided under this title, each such project area or project school advisory council, in addition to meeting the requirements of subparagraph (A), shall—

"(i) be composed of not less than 8 members, who shall serve for terms of two years, after which time they may be re-elected;

"(ii) elect officers of the council after it has been fully constituted; and

"(iii) meet a sufficient number of times per year, according to a schedule and at locations to be determined by such council.

"(3) Any individual who is a teacher at a school serving a project area or is a parent of a child residing in an eligible school attendance area or attending an eligible school shall be eligible to be elected as a member of the district-wide advisory councils established pursuant to paragraph (1), but nothing in this sentence shall preclude the eligibility of other individuals who are residents in that district. No individual who is a teacher at a project school or a school serving a project area shall be ineligible to be elected as a member of a district-wide or project area or school advisory council on the basis of residency outside such area or district.

"(b) RESPONSIBILITIES OF ADVISORY COUNCILS.—Each local educational agency shall give each advisory council which it establishes under subsection (a) responsibility for advising it in planning for, and implementation and evaluation of, its programs and projects assisted under this title.

"(c) ACCESS TO INFORMATION.—(1) Each local educational agency shall provide without charge to each advisory council established by such an agency under subsection (a) of this section— and, upon request, to each member of such advisory council--

"(A) a copy of the text of this title.

"(B) a copy of any Federal regulations and guidelines issued under such title; and

"(C) a copy of appropriate State regulations and guidelines associated with this title.

"(2) Each State educational agency shall provide a copy of any report resulting from State or Federal auditing, monitoring, or evaluation activities in any district to the parent advisory council established pursuant to subsection (a)(1) in such district.

"(d) TRAINING PROGRAMS.—Each local educational agency application for funding under this title shall describe a program for training the members of advisory councils established pursuant to subsection (a) to carry out their responsibilities as described in subsection (b). Such training program—

"(1) shall be planned in full consultation with the members of such advisory councils;

"(2) shall provide each member of each such council with appropriate training materials; and

"(3) may permit the use of funds under this title for expenses associated with such training, including expenses associated with the attendance of such members at training sessions.

"(e) WORKSHOPS ON PARENTAL INVOLVEMENT.—For each fiscal year for which payments are made to State educational agencies under this title, the Commissioner shall sponsor workshops in the several regions of the United States which shall be designed to assist local educational agencies to work with and provide training to parent advisory councils established under subsection (a) of this section and to facilitate parental involvement in the programs conducted under this title. The workshops shall be planned and conducted in consultation with members of parent advisory councils in the region served by the workshop.

"(f) ASSESSMENT OF PARENTAL INVOLVEMENT AND TRAINING.—The National Institute of Education shall assess the effectiveness of (1) various forms of parental involvement, including parent advisory councils, on school governance, student achievement, and other purposes of this title, and (2) various methods of training the members of parent advisory councils, and shall report the results of such assessments to the Congress and the public.

"(g) AUTHORIZATION OF APPROPRIATIONS.—There are authorized to be appropriated for fiscal year 1979 and for each succeeding fiscal year ending prior to October 1, 1983, such sums as may be necessary to carry out the provisions of subsections (e) and (f) of this section.

Table 2

Brief Notes on Basic Components in 1978 Legislation (P.L. 95-561) Regarding Parent Involvement

Section 124: "Parent Participation"

- Parents permitted to participate in establishing programs
- Parents are informed of, and permitted to make, recommendations re instructional goals and their children's progress
- Parents are afforded opportunities to assist their children in achieving goals

Section 125: "Parent Involvement"

Establishing Advisory Councils

- All LEAs must establish a district advisory council that:
  - is elected by parents in the district or by the schools advisory councils (see below),
  - has a majority consisting of parents of children served, and
  - includes representatives of eligible children who are not participating.
- Each participating school must also have a school advisory council, unless there are fewer than 40 students in the program and not more than one FTE staff person
- The size of the school advisory council is not specified when there are 40 to 74 students.
- If 75 or more students are served, the council must:
  - have at least 8 members, elected for 2-year terms and they can be reelected
  - elect officers, and
  - meet a "sufficient number of times per year".
- Teachers and parents can be advisory panel members as well as other individuals residing in the area.

Table 2 (continued)

Advisory Council Responsibilities	• Councils are responsible for advising on: - planning for, - implementation, and - evaluation of Title I Programs. • Other sections of the law give advisory councils consent power in two areas: - district proposals to use alternate ranking of schools (Section 122), and - plans to use funds for schoolwide projects (Section 133).
Access to Information	• Each council must receive a copy of the law, the regulations, any SEA guidelines, and reports of SEA or ED audits, monitoring, or evaluation • Each member of a council can have these reports upon request.
Training Programs	• Each LEA application for funds must describe a program for training advisory council members to carry out their responsibilities.

Parents are also mentioned in several other points in the law:

Sec. 127	• The application must be made available to parents.
Sec. 128	• Parents and parent advisory councils are listed as potential initiators of complaints, and they must be told what the complaint resolution procedures are.
Sec. 129	• When individualized educational plans are developed for students, parents should agree on it.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to determine what effects this prescriptive piece of legislation had on state administration:

- To what extent did states implement--and help their districts implement--these parent involvement provisions?
- What problems did states encounter in implementing the parent involvement provisions?
- Did the provisions stimulate states to develop exemplary practices in this area?
- To what extent would states plan to continue involving parents if there were no or minimal requirements for them to do so?

States operated under the 1978 statute and 1981 regulations for a brief time, when Chapter 1 of the Education Consolidation and Improvement Act was passed. While the intent of Title I programs was maintained under Chapter 1, the requirements that parents be involved in Chapter 1 were made less strict:

> The application ... shall be approved if it provides assurances ... that the programs and projects described ... are of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting the special educational needs of the children being served, and are designed and implemented in consultation with parents and teachers of such children. (Section 556 (b)(3))

Also included in this discussion are states' preliminary views of the impact of Chapter 1 on their future parent involvement activities. The chapter concludes with opinions of a sample of districts to their states' parent involvement activities.

Implementation

This section will present an overall picture of how states implemented the parent involvement provisions of the 1978 Title I law: What activities did they engage in, who was responsible for parent involvement, and what attitudes did states hold toward the parent involvement requirements?

Title I coordinators reported that, on the average, they devote a little more than 12 percent of staff time to parent involvement activities. Their responses ranged from a minimum of 2 percent to a maximum of 32 percent. The coordinators were also asked to indicate how much time they would like to spend on parent involvement activities in the future. While the coordinators as a group tended to be satisfied with the amounts of time currently spent in this area, some coordinators wanted to spend 20 percent more time while others wanted to spend as much as 15 percent less time in parent involvement activities.

Five basic types of SEA level parent involvement activities were identified. These activities are listed in Table 3.

Table 3

State-level Parent Involvement Activities

Activity	Number of States
• Work directly with LEAs	27
• Conduct workshops/conferences	32
• Develop/disseminate information to LEAs	19
• Work with state Title I parent involvement councils or other parent groups	12
• Work with other SEA staff to involve them with parent activities/issues	6

An overall measure of parent involvement activity was obtained by summing across these variables for each state. This distribution is presented in Table 4.

Table 4

Number of Parent Involvement Activities

Number of State-level Activities	Number of States
0	6
1	13
2	15
3	13
4	2

It is noteworthy that six states reported that no parent activities were conducted at the state level. In some of these cases, however, states felt that conduct of parent involvement activities was totally a local--not a state--responsibility.

The degree of parent involvement activity is not related to any major demographic variables, including the amount of state administrative funds, amount of administrative funds per LEA, years of experience of the Title I coordinator, number of professional staff, or any of the population variables. However, the level of parent involvement activities is related to the configuration of attitudes and activities discussed in other chapters in this report. For example, states that engage in two or more "quality" monitoring activities are more likely to engage in more parent involvement activities, and states that were successful in reducing paperwork through use of the three-year application approval cycle were much more likely to engage in several parent involvement activities. The relationship with "quality" monitoring is presented below in Table 5; Tables 6 and 7 in the chapter on Application Approval present these other relationships.

Table 5

Relationship between the Number of Quality Monitoring Activities and the Number of Parent Involvement Activities

Number of Quality Monitoring Activities	Number of Parent Involvement Activities				
	0	1	2	3	4
0-1	4	10	9	2	2
2 or more	2	3	6	11	0

As discussed in the Application Approval chapter, successful users of the three-year cycle are also more active in the delivery of services to LEAs. This, as it turns out, applies both to parent involvement and states' use of monitoring to improve program quality.

Who Has Responsibility for Parent Involvement?

Ten states indicated that the Title I coordinator took responsibility for handling state-level parent involvement activities. In 32 states, the responsibility was given to a staff member, and in four others, each Title I consultant was responsible for the parent involvement activities in his or her districts. In general, all states that assigned responsibility to a staff member are "larger" than the other two groups of states: They have more funds for state administration (but not more setaside per LEA), they have larger populations, they have more SMSAs greater than 25,000 and 100,000, and they have more professional staff in their Title I offices. They are also more active in parent involvement, as is shown in Table 6.

Table 6

Relationship of Person Responsible for Parent Involvement and Parent Involvement Activities

Person Responsible	Meet with LEAs No	Meet with LEAs Yes	Conduct Workshops No	Conduct Workshops Yes	Develop/Disseminate Information No	Develop/Disseminate Information Yes
Coordinator	5	5	4	6	5	5
Staff Member	11	21	8	24	13	19
Each Consultant	1	3	1	3	1	3

Attitudes toward Parent Involvement

A clear finding from the interviews with Title I coordinators was that they make a distinction between the two parts of the law where parent involvement is specified, i.e., Section 124 on parent participation and Section 125 on parent advisory councils. The coordinators were asked to indicate how important they felt each of these sections was in terms of addressing the initial purpose of the Title I legislation, namely:

- to provide financial assistance to LEAs that have concentrations of children from low-income families,
- to expand and improve educational programs for these children, and
- to provide programs that are that are sensitive and responsive to the special needs of educationally deprived children.

The results are presented in Table 7.

Table 7

Relationship between Importance of Parent Participation and Importance of PACs

Importance of Parent Participation (Section 124)	Importance of PACs (Section 125) Little Importance	Moderate Importance	Substantial Importance
Little Importance	3	0	0
Moderate Importance	4	4	0
Substantial Importance	10	17	10

It is striking that most of the states that rated parent participation as being of moderate or substantial importance rated PACs as being less important.

The states were grouped into four categories in order to quantify coordinators' attitudes toward parent involvement. These four categories are:

- positive about parent participation and the PACs (N = 4),
- positive about parent participation and concerned about aspects of the PACs (N = 24),
- positive about parent participation and negative toward PACs (N = 17), and
- negative toward parent participation and negative toward PACs (N = 2).

These data show that two coordinators were clearly negative toward both the parent involvement provisions and the PACs, while four were positive not only about "participation" but also the 1978 PAC prescriptions. The remaining coordinators were positively inclined toward parent participation as specified in Section 124 but differed over the issue of the PACs. Seventeen of the coordinators expressed very negative opinions regarding the PAC provisions, but twenty-four of the coordinators expressed annoyance at some of the PAC provisions but they were not totally opposed to them. These coordinators frequently stated that it was the specific requirements concerning council membership, elections, or meetings that created difficulties, not the existence of PACs *per se*. Thus, the data indicate that parent participation is favorably accepted by the overwhelming majority of coordinators. This summary attitude measure did not correlate with the major demographic variables, including the amount of funds for state administration, population, or staffing. However, attitudes toward parent involvement *do* correlate with both the number of quality monitoring activities (Table 18 of the Monitoring chapter) and the types of technical assistance activities (Table 11 of the Technical Assistance chapter). The correlates noted in the technical assistance area are, in general, consistent with the notion that states with positive attitudes toward parent involvement are more likely to engage in "personalized" ways of delivering technical assistance, and are less likely to engage in the more "impersonal" methods of providing technical assistance (e.g., statewide meetings and conferences). And the relationship of parent involvement activities and quality monitoring activities shows that these states are the ones who tend to do "extra" monitoring activities to improve program quality.

Coordinators also reported substantially more problems with Section 125 of the law than Section 124 as described in the next section.

Problems

Problems with the parent involvement provisions were reported by states when carrying out their state responsibilities in the areas of application approval, technical assistance, monitoring, and complaint resolution as shown in Table 8. These problems generally focused on the difficulties in meeting the parent council requirements as required by Section 125.

Table 8

Problems Caused by Parent Involvement Requirements in Other State Responsibilities

	Number of States Reporting Problems with	
State Responsibility	Parent Participation (Section 124	Parent Advisory Councils (Section 125)
Application Approval	8[a,b]	18[a,b]
State Rulemaking	1	0
Technical Assistance	2	8[a]
Monitoring	5[a,b]	16[a]
Complaint Resolution	1	1

---

[a] These items were reported as being "major" problems by at least one state Title I coordinator.

[b] These items were reported as being a "major" problem by at least one-half of the state Title I coordinators reporting it as a problem.

Less than one quarter (N = 11) of the states indicated they had problems with the parent participation provisions as specified by Section 124, although 39 states indicated having problems with the district or school parent advisory council requirements in Section 125. This is consistent with the attitude data in which state coordinators expressed more positive attitudes toward the parent participation provisions.

Of the eleven states that had problems with Section 124 on parent participation, five of these indicated that the problem centered around the difficulty of involving parents in any fashion. Three of the states indicated that the problem centered around the LEAs' understanding of what constituted true parent involvement. In these states, the SEA had to provide a great deal of additional technical assistance in order to help districts get parents really involved in the education of their children. Seven of the eleven states with Section 124 problems also indicated they were working or had worked on solutions to the problems. Of these seven, three indicated that the SEA itself initiated the solutions, one reported the solution was initiated by an LEA, and three stated that the solutions were developed jointly.

Problems with the councils do not imply that the state has a negative attitude toward parent involvement. Rather, problems are due to the particular forms of parent involvement required by Section 125. In most instances, problems with Section 125 result from some basic incompatibility of this requirement with the existing social and political realities of the districts. Thirty-nine of the states indicated that they have problems with Section 125. The most frequently reported problems are listed in Table 9.

Table 9

Problems Associated with Section 125

Problem	Number of States
• Section 125 is too restrictive	17
• The council membership requirements are a major problem	16
• Problems stem from electing members	18
• Problems stem from the requirements for meetings	9
• This section is too complex	5
• Strong negative comments	9
• Other	11

Generally, the coordinators believe that the specific provisions of Section 125 were not well thought out and adverse consequences were not anticipated. For example, one state that is active in parent involvement, said:

> The net effect of the detail of Section 125 and the regs has been to discourage parent volunteerism. Parents who want to help out see all the procedures involved in setting up and running PACs and decide it's too much

> trouble. We have been trying to combat this by providing operating room to PACs.

Many of the coordinators cited difficulties related to the requirements concerning the specific number of parents, the election requirements, and various practical difficulties associated with assembling the parents for the required meetings. Rural states and small districts, in particular, have problems in this area. One coordinator remarked:

> We are a rural state with small districts; mobility is low and parents all know each other. They know and elect the school board among themselves and see those requirements as duplicating what they've already done by electing a school board.

Another Title I coordinator asked:

> If you have only a small program like $10,000, how much parent advice do you really need to run it?

The problem of getting parents to come to the meetings came up very frequently:

> It is very difficult to get council members--the correct number. Particularly where a school has undergone desegregation. The kids come from all over the city and parents won't drive across town for a meeting.
>
> The people who wrote the law didn't realize how hard it is to get people to come to the meetings. We just can't get them to be on the council and come to the meetings. We've tried everything to get them to come--different types of meetings (e.g., dinners) and at different times of the day. Some strategies have worked but we haven't completely solved it.
>
> We try to feed the parents when they come to meetings.
>
> I can't get excited about having a district spend several thousand dollars to bring parents to a central meeting so I don't say too much about it if they haven't done it. I don't disallow their programs for this reason.

The requirement of two-year terms causes other problems:

> Some of our middle schools only have two grades. Cases thus arise in which PAC members have been elected for two years and in the first year the council does have a majority of members whose kids are being served, but in the second year the balance shifts and no longer does the PAC have a majority of members with kids being or to be served.

The only groups of states who felt relatively comfortable with Section 125 were states with a very long history of parent involvement and councils and the New England states. In both instances, the reason for their more positive attitude is that PACs are more compatible with their pre-1978 activities or political process. In the first instance, these states happen to have the strongest tradition of parent involvement in Title I; in the second instance, citizen involvement in local decision-making is a tradition that goes back hundreds of years. Of the six ED Region I states (New England), four rated the PACs as "extremely important;" no other region even showed a majority of states with this rating. The key difference between New England and the rest of the nation is that these states have a long tradition, going back to the colonial days, of a true democratic form of local government, as implemented by the Town Meeting. Thus, the idea of the citizens participating in the political process through formal meetings is not alien to them:

> Every LEA or town in our state already has school district meetings in which budgets and other important matters are approved by the parents. They already have real power. The PACs must fit into this structure and are somewhat artificial.

Thus, for New England states, the specific requirements of Section 125 happened to be more compatible with their own style of local government. The vast majority of states, however, joined the Union following the ratification of the Constitution in 1789 and, thus, have a tradition of a republican rather than a democratic form of local government; thus, the provisions of Section 125 conflict more strongly with existing practices and traditions.

For these states, coordinators felt that the basic goals of parent involvement could better be met with less formalized procedures. Devices such as regular parent-teacher conferences and actively encouraging parents to help with homework were frequently cited as more practical and effective ways of involving parents. Other states favored the idea of councils but argued for much more flexibility in terms of the number of members, requirements for meetings, and ways in which parents are to be selected. For example, even states with a strong tradition of parent participation want the flexibility to integrate Title I parent involvement with the pre-existing forms of citizen participation. As is indicated above, this comment is made also by New England states.

Changes Required by the 1978 Amendments

Thirty-five of the states said that they had to make changes in their administration of parent involvement when the 1978 Education Amendments were passed. This is not surprising given that the 1978 Amendments made so many changes in the parent involvement provisions.

Nine states indicated that they essentially made no change in their activities. In other words, in these nine states, parent advisory councils (a major focus in the 1978 law) were already in place prior to 1978.

Fourteen of the thirty-five states indicating that their parent involvement activities chanaged as a result of the 1978 law stated that parents in the state were now more involved. In fifteen states, the coordinators reported that the state education agency itself was now more involved. The coordinators in twenty-one states reported that the changes they made were simply to meet the new specific requirements in the law.

Development of Exemplary Practices

Forty-three states reported that they developed exemplary practices in the area or parent involvement that they felt could be shared with other states. Fourteen of these states felt they had developed exemplary processes or procedures, and twenty-four of these states indicated they had developed exemplary materials. A sample of these materials is compiled into a separate volume (see Harrison, 1982).

Table 10 shows the relationship of exemplary practices and attitude toward parent involvement.

Table 10

Development of Exemplary Practices as a Function of Parent Involvement Attitude[a]

	Attitude			
Exemplary Practices	Positive Participation and PACs	Positive Participation and less Positive PACs	Positive Participation and anti-PACs	Negative toward Participation & anti-PACS
No	0	4	5	2
Yes	4	18	11	0

---

[a] Data from two states are missing.

Not surprisingly, exemplary practices were more likely to have been developed by states with more positive attitudes.

It was hypothesized that states producing few materials of their own might be more likely to utilize materials from other sources. States were asked what types of materials they used in helping their districts implement the parent involvement provisions. The five most frequently listed sources are shown in Table 11.

Table 11
Use of Parent Involvement Materials
Produced by Other Sources

Material	Number of States
• Title I: How it Works, by ED	37
• Title I: Working With Schools, by ED	34
• Materials prepared by The Coalition of T.I. parents	14
• ERIC documents	3
• Materials developed by other states	17

States varied in terms of the number of different materials they reported using. Table 12 presents the number of different materials used as a function of staff person given responsibility for parent involvement activities.

Table 12

Number of Parent Involvement Materials Used as a
Function of Staff Person Assigned to Parent Involvement Responsibility

Person Responsible	Average Number of Materials Used
Title I Coordinator	2.7
Staff Member	5.3
Each Consultant	4.2

It is apparent that designation of the responsibility to a particular individual results in greater use of other resource materials. It is also not the case that states compensate for a lack of their own materials by using materials from other sources: States that have developed exemplary practices report using more materials produced by other sources than the other states.

Continuation

At the end of the parent involvement section of the interview, states were asked whether they would continue to involve parents if there were no or minimal legal requirements for them to do so. Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As part of the interviews conducted onsite to a representative sample of 20 states, statelevel personnel were queried specifically about their continuation plans under Chapter 1. By this time, Chapter 1 requirements were a little better understood, and state coordinators were beginning to make plans as to what aspects of their Title I practices would or would not be included as part of Chapter 1 management.

The discussion on continuation plans is presented in two parts. The speculative answers provided by the 49 Title I coordinators during the telephone interviews will be summarized and interpreted first. The information obtained from the 20 state Title I coordinators in response to specific probes about their plans to include parent involvement activities under Chapter 1 will follow.

Parent Involvement Plans: A Speculation

The answers of the coordinators to the theoretical question, whether they would continue parent involvement activities if they were not expressly required by law, are summarized in Table 13.

Table 13

Parent Involvement Continuation Plans

Plan	Number of States	
• Not Continue	2	
• Unsure/Don't Know	6	
• Continuation of Parent Involvement Activities in Some Form	41	
- SEA will take active effort		14
- SEA will only encourage LEAs to be active		14
- SEA will provide no encouragement--activities left up to LEA option		9
- SEA will continue to require some form of councils		14

From this table it is apparent that most states are interested in continuing parent involvement activities, and approximately one-third are desirous of having parent advisory councils continue--albeit not in accordance with the requirements of the 1978 Title I law.

A comparison of those states that reported plans to take active effort to ensure future parent involvement activities with those states that plan only to encourage their districts to continue activities in this area is shown in Table 14.

Table 14

A Comparison of States Reporting "Active" and "Passive" Continuation Plans in Parent Involvement

Variable	SEA Will Take Active Effort (N = 14)	SEA Will Only Encourage (N = 14)
• Staff Person		
- Title I Coordinator	1	5
- Staff Member	12	6
- Each Consultant	1	1
• Satisfaction with Time Spent on Parent Activities (Actual-Ideal)	-.18	2.15
• Development of Exemplary Materials		
- No	2	6
- Yes	10	7
• Importance of Parent Participation (Section 124)		
- Little or none	0	2
- Moderate	5	1
- Substantial	9	11
• Importance of Parent Councils (Section 125)		
- Little or none	5	7
- Moderate	5	5
- Substantial	4	2
• Number of State-level Parent Involvement Activities		
- 0 - 2	8	10
- 3 - 4	6	4
• Parent Involvement Attitude		
- Pro Involvement and Pro Councils	2	0
- Pro Involvement, Less Pro Councils	9	6
- Pro Involvement, Anti Councils	3	7
- Anti Involvement, Anti Councils	0	1

The states that plan to take more active effort tend to have a staff person assigned to handle parent involvement activities, they developed exemplary materials, and they tended to have more positive attitudes toward parent participation. The states that plan to take a more passive stance toward continuation of parent involvement activities, on the other hand, are less active, they want to spend less time on parent involvement activities in the future, and they have more negative attitudes toward parent participation in general.

The states planning to take active effort in parent involvement have also been active in conducting their other state responsibilities, such as monitoring and rulemaking. A comparison of these states with those planning to play a more positive role considering their monitoring and rulemaking activities is shown in Table 15.

From Table 15 it is apparent that those "active" states in parent involvement are also active in monitoring to ensure both program quality and compliance, and they tend to make more rules to help districts design quality programs (but not make more quality design rules as described in the chapter on Rulemaking). In short, the profile of these states fits the profile of the "quality"-oriented states described elsewhere in this report. The "passive" states, on the other hand tend to have more compliance attitudes in monitoring and are less active generally in both of these other areas of state responsibility.

Table 15

Comparison of States Reporting "Active" and "Passive" Continuation Plans in Parent Involvement on the Basis of Their Activities and Attitudes in Other Areas of State Responsibility

Active Continuation Plans	Monitoring							Rulemaking			
	Monitoring Attitude			Number of Quality Monitoring Activities		Number of Compliance Monitoring Activities		Number of Rules to Help Districts Design Quality Programs		Numbers of Quality Design Rules	
	Quality	Both	Compliance	Low	High	Low	High	Low	High	Low	High
No	4	18	11	21	14	24	11	19	16	26	9
Yes	2	9	3	5	9	4	10	5	9	9	5

Passive Continuation Plans	Monitoring							Rulemaking			
	Monitoring Attitude			Number of Quality Monitoring Activities		Number of Compliance Monitoring Activities		Number of Rules to Help Districts Design Quality Programs		Numbers of Quality Design Rules	
	Quality	Both	Compliance	Low	High	Low	High	Low	High	Low	High
No	6	18	10	18	17	19	16	15	20	26	9
Yes	0	9	4	8	6	9	5	9	5	9	5

Parent Involvement Plans: Preliminary Views of Chapter 1 Impact

During subsequently conducted onsite interviews to a sample of 20 states, the Title I coordinators, and their parent involvement coordinators if available, were probed about their specific plans for involving parents under Chapter 1 so that the comments of these coordinators can be placed in perspective. A summary of their past parent involvement activities is included in Table 16.

Table 16

National Sample of 20 States: Description of Past Parent Involvement Activities

Variable	Number of States
• Staff Person	
- Title I Coord.	3
- Staff Person	15
- Each Consultant	2
• Work Directly with LEAs	
- No	8
- Yes	12
• Conduct Workshops	
- No	3
- Yes	17
• Develop/Disseminate Information	
- No	7
- Yes	13
• Work with State PAC/ State Parent Group	
- No	17
- Yes	3
• Work at State Level with other SEA Staff	
- No	16
- Yes	4
• Problems with Parent Participation (Section 124)	
- No	16
- Yes	4
• Problems with Advisory Councils (Section 125)	
- No	4
- Yes	16
• Numbers of State-level Activities	
- None	1
- One	3
- Two	6
- Three	10
• Parent Involvement Attitude	
- Pro Involvement, Pro Councils	3
- Pro Involvement, Less Pro Councils	12
- Pro Involvement, Anti Councils	4
- Anti Involvement, Anti Councils	1
• Continuation Plans[a]	
- Continue Parent Involvement in Some Form	
- Don't Know	3
- No	1
- Yes	16
:SEA Takes Active Effort	7
:SEA Encourages LEA to Take Active Effort	7
:SEA Encourages Only	3
:Retain Councils	5

---

[a] Data collected during initial telephone interviews.

It is of interest that the sample contains such a high proportion of active states in parent involvement, plus states that have extremely positive as well as negative attitudes toward parent participation, councils in particular.

Nineteen of the twenty states felt they would plan to continue parent involvement activities under Chapter 1. The remaining states felt parent involvement activities would not occur at the state level, but that the state would inform its LEAs of the Chapter 1 requirement to consult with parents. While two states indicated that continuation would occur primarily due to the fact that Chapter 1 required that parents be consulted at the local level, the remaining states appeared to be enthusiastic about their reasons for continuation. A sampling of their comments includes:

> Parent involvement is a very critical part of the program. It enhances students' desire to learn.
>
> Parents need to have a role in monitoring the student's achievement of goals. The LEAs must assure this by formal activity. It is a key to effective education.
>
> Parent involvement is a very big thrust in the state agency even outside of Title I.
>
> Parents have a stake in education and should be heard.

Sixteen of the states indicated that their parent involvement activities would probably change under Chapter 1. The general sentiment of these states was that the lack of council requirements would create the change. While some states felt their LEAs would opt to retain councils, it was expected that they would relax many of the current council requirements. As one state coordinator said:

> The emphasis will be more on involving parents in education and not on formal meetings.

Most states welcomed the relaxation in PACs and their accompanying requirements. These comments are typical:

> We will not be concerned with the specifics of electing PACs. We will not be watching LEAs as closely in this area.
>
> Our Parent Involvement Coordinator has spent too much time with PAC issues--would like to change that role.

Some states felt their larger or medium-sized LEAs would probably opt to keep the school and district councils, but that small and rural LEAs might drop them. The pattern of changes that will occur at the local level will probably vary and be tailored to the needs of individual sites. For example, some districts will probably eliminate district councils while others will eliminate school councils. Districts in rural areas comprised of several small towns, each with a single Title I school, often found school councils to be valuable but were unable to get parents to drive 15 to 20 miles to attend district meetings. Small districts with two Title I schools in the same town often found district councils worked well, but that school councils seem somewhat superfluous. And, of course, some districts will eliminate councils altogether. Therefore, the changes that occur at the local level will reflect individual circumstances. The solutions will be based on decisionmaking at the district, but the states may be called upon to help LEAs find solutions to meet individual needs.

However, approximately one-half of the states were concerned that the Chapter 1 legislation went too far in reducing the specificity of the parent involvement requirements. Comments made by these coordinators include:

> I don't know about the future--it really bothers me that a lot of parent involvement activities were cut out. I hope we can keep the momentum going without the legislation.
>
> We intend to keep our state PAC. We know that active LEA PACs will also want to stay involved.
>
> We like PACs. We hope LEAs opt to continue them. Since we can't mandate them, we will have to encurage them only. If an LEA wants to end a PAC, we will try to encourage them to keep it.
>
> We want to mandate councils, but the feds won't let us. How can they give [flexibility] with one hand and take it away with the other?

The states that wanted to mandate councils but felt they were unable to reported that they were told by ED that such a mandate would violate the intent of the Chapter 1 law. Two of these states expressed frustration over this issue, because they felt that PACs *were* an effective way to involve parents.

With respect to changes in activity at the *state* level, some states felt that the amount of time state staff will devote to parent involvement would diminish. Others felt that the state role would become stronger because the state would now be responsible for informing the districts of viable options for parent involvement. Another way in which it was felt the state role might become stronger was in the area of application approval. States must assure to their satisfaction that local programs have been designed and implemented in consultation with parents. Making this determination may require substantial effort. As one state said:

> We will now have to ask for and examine the specific kinds of parent involvement conducted at the LEA.

Six state coordinators indicated that they anticipated problems with carrying out any future parent involvement activities. These problems are:

- lack of funds and staff to support the level of effort in parent involvement that we would like (N = 3),
- lack of certainty over what parent involvement activities the state can require of its LEAs (N = 2),
- concern by states over the possible misinterpretation by their LEAs that parents need no longer be included (N = 2), and
- concern over how to define a "consultation" as required by law.

Other concerns were also expressed by states over the future of parent involvement under Chapter 1. Two states fear that the removal of the council provisions has led some groups to assume that parent involvement is no longer an important feature in the legislation. One state mentioned that some parent advocates may react negatively; they were given power and clout through the councils and will definitely push to continue as an active governing presence in the schools. Another state mentioned that some state and district staff may view the new law as an opportunity to do away with parent involvement in any form, simply because councils are no longer required.

Parent Involvement: A District Perspective

To obtain information on parent involvement from the district perspective, 60 districts were queried about their states' activities in this area during onsite visits to a sample of 20 states. Information was sought in the following areas:

- How does your district currently involve parents in the Title I program?
- Do you feel that parent advisory councils are an effective way to involve parents in Title I?
- What do you feel are the best or most useful aspects of parent involvement activities?
- What do you feel are the worst or least useful aspects of parent involvement activities?
- How helpful has the state been to you with respect to parent involvement activities?
- If there were no requirement in the law for parent involvement in Title I, do you think parent involvement should be included as part of your district's activities?

The major ways in which the districts mentioned they currently involved parents in the Title I program are shown in Table 17.

Table 17

Ways in Which Districts Involve Parents in Title I Programs

Activity	Number and Percent of Districts Reporting
School and district councils	39 (67.2%)
Workshops, classes or conferences with parents	17 (29.3%)
Parents visit school, openhouse visits, parent/teacher conferences	12 (20.7%)
Parents as volunteers (e.g., on field trips)	6 (10.3%)
Parents involved in planning, especially with applications	4 (6.9%)

Although most districts mentioned that they had parent advisory councils, there are mixed feelings regarding whether they feel councils are an effective way to involve parents in Title I. Approximately onehalf of the districts (N = 27) felt that use of councils was an effective device, while the remaining felt that councils were not an effective vehicle (N = 28) for involving parents or that they were unsure (N = 5) whether councils were effective. It is apparent that districts felt there were both good and bad aspects to the councils.

What districts liked best about parent involvement activities is summarized in Table 18. Their responses are categorized according to the major beneficiaries from the involvement, and sample comments for each category are presented. According to districts, the major beneficiaries are the parents themselves, followed by the children and the school. The community also was cited as a beneficiary, and the relationship between the school and parents and the community, as well as between LEA and SEA, was felt to be strengthened by parent involvement.

Table 18

What LEAs Liked Best About Parent Involvement Activities

Comment	Number of Districts
• Parents benefit from the activities -Parents gain awareness of school and their children -It's good therapy for parents and some have obtained school jobs due to involvement -Parents learn parenting and education strategies	22
• Children benefit from parent involvement -Kids are helped more at home -Increases children's self esteem -There is greater sensitivity to children's needs and progress	14
• The school benefits from parent involvement -It provides support to the program at the building level -School gains insights into needs of kids -Parent support means a more successful school	12
• The community benefits from parent involvement -Councils are good politically and educationally. Legislators listen to parents -Greater awareness of education in the community -Parents spread word about Title I through the community	9
• The relationship between parents/community and the school is strengthened -Parents and teachers are more relaxed with each other -Increased interaction between schools, children, and parents -Communication between parents and schools is increased	13
• The relationship between the LEA and the SEA has been strengthened -SEA has provided excellent technical assistance -SEA has been very encouraging	3

Districts felt the worst or least useful aspects of parent involvement activities clearly focused on the parent councils. Some mentioned councils generally and others mentioned specific attributes of the councils--elections, membership requirements, separate school and district councils. Ten districts were concerned about the administrative role parents had been given through the councils, five stated that there were problems with the types of parents who became involved, and three commented on the difficulty of getting parents involved. These comments, of the 52 districts reporting problems, are presented in Table 19.

Table 19

What LEAs Liked Least About Parent Involvement Activities

Comment	Number of Districts
• Parent Advisory Councils generally	13
-PACs	
-Specific PAC requirements	
• Parent Advisory Council election requirements	11
• Administrative role given to parents	10
-Parents shouldn't be involved in planning the program	
-Extent of parent involvement in planning is too great	
-Parents are not qualified to advise on planning, implementing, and evaluating and there is a lot of wasted effort in explaining all of these to parents	
-Parents are really not interested in looking at the implications or seeing the books--they only want to talk about their kids	
-They're just going through the motions of being advisory	
-Councils gave parents the erroneous idea that they have a right to know absolutely everything--even information they do not need to know	
-Parent sign off on the application	
• Characteristics of the parents who get involved	5
-Some parents are disorganized and sometimes militant	
-Parents sometimes have negative attitudes	
-Parents who respond are the wrong type to be helpful in an advisory role	

Table 19 (continued)

-One or two people tend to dominate	
• Parents are Uninterested	3
-We plan meetings and no one comes -It's hard to get people to serve on councils	
• Parent Advisory Council membership requirements	3
• Problems with the state role	3
-The state has mandated additional activities -The state doesn't understand our parent budget items -The state could help more	
• Forming individual school councils is a problem	2
• The formal, business structure of councils is artificial	2
• Individual specific concerns	4
-Forming district councils is a problem -Parent training programs -Too many national conferences for parents -Too many requirements for parent groups for different school programs	
• The only problem is councils may not be able to continue	1
• Some people have misinterpreted parent involvement to mean parents want to take over; this is not true	1

Three districts mentioned that the relationship between the SEA and the LEA was strengthened by parent involvement activities and three districts mentioned that their states caused some of the problems associated with parent involvement. This raised the question of whether state views on parent involvement affected the manner in which they relate to the districts. Districts were asked to indicate how helpful their states had been with respect to parent involvement activities. The majority of LEAs felt that their states had been extremely helpful (N-27, 48.2 percent) or slightly helpful (N=17, 32.4 percent) to them in carrying out their local parent involvolvement activities. The remainder felt either neutral about their states' efforts (N=8, 14.3 percent) or that their states had actually hindered them (N=4, 7.1 percent).

These district responses were compared with three measures of state attitudes toward parent involvement. States rating of the importance of the legal provisions for parent involvement and parent councils as stipulated in Sections 124 and 125 of the 1978 legislation and the parent attitude mentioned above that categorized states on the basis of their feelings toward parent involvement and parent councils. The first two cross tabulations are shown in Table 20; the third crosstabulation is presented in Table 21.

Table 20

Districts' Perceptions of SEA Helpfulness as a Function of State-level Parent Involvement Importance Ratings

	State Rating of Section 124-- Parent Participation			State Rating of Section 125-- Parent Advisory Councils		
Districts' Perception of State Helpfulness	Little Importance	Moderate Importance	Substantial Importance	Little Importance	Moderate Importance	Substantial Importance
Hindered	1	0	3	1	2	1
Slightly Helpful	3	5	9	7	8	2
Helpful	2	3	22	11	12	4
Neither	0	1	7	6	1	1

This table suggests that states that rate Section 124 as being of substantial importance were viewed by their districts as being extremely helpful to them. It is interesting to note that, despite states' relatively low importance ratings given to Section 125, states are viewed by their districts as being helpful to them to implement these provisions.

Table 21

Districts' Perceptions of SEA Helpfulness as a Function of State Parent Involvement Attitudes

Districts' Perceptions of State Helpfulness	State Attitude Pro Involve- and Pro Councils	Pro Involvement, Less Pro Councils	Pro Involvement, Anti Councils	Anti Involvement and Anti Councils
Hindered	1	2	1	0
Slightly Helpful	1	10	3	3
Helpful	5	15	7	0
Neither	2	5	1	0

Thus, even when states feel less positively toward particular parent involvement activities, they are still perceived by their districts as offering help to them. It thus appears that state attitudes have not interfered with their technical assistance roles.

Congruence between state and district views on the issue of whether councils are an effective way to involve parents is presented in Table 22.

Table 22

Relationship between State and District Attitudes toward Effectiveness of Parent Advisory Councils

District Attitudes toward Councils	State Attitude Pro Involve- and Pro Councils	Pro Involvement, Less Pro Councils	Pro Involvement, Anti Councils	Anti Involvement and Anti Councils
Yes, councils are effective ways to involve parents	4	19	3	1
No, councils are not effective ways to involve parents	5	10	8	2
Don't Know	0	4	1	0

This table suggests that there tends to be some congruence between SEA and LEA views regarding effectiveness of councils in involving parents. Whether this is a causal relationship and, if so, whether the relationship flows from the SEA to the LEA or vice versa, cannot be determined.

Finally, districts were asked if they thought parent involvement should be included as a part of their districts' activities if there were no requirement in the law for such involvement. The response to this was clear and strong. Of the 56 districts responding, 55 said "yes," none said "no." There was one "don't know."

These data confirm that the parent involvement provisions in the 1978 Title I legislation evoke mixed reactions from the districts. Virtually all districts feel parent involvement in general should be an important component of district actitivies, and the benefits that have accrued to districts from implementing the 1978 requirements are many. The crux of the problem appears to be the requirement for parent councils. Virtually all comments concerning the worst or least useful aspects of parent involvement activities centered on the advisory councils. It is not clear that all districts want to see councils "done away with" altogether, some only want specific requirements repealed or more built-in flexibility. Reflective of this ambiguity was the districts' response to the perceived effectiveness of councils as a method for involving parents: 27 said yes, 26 said no, and 5 didn't know. There is clear uncertainty regarding the value and utility of the parent advisory councils--there are equal numbers of proponents and opponents. But there is strong agreement that parent involvement generally is important and valid.

ENFORCEMENT

ENFORCEMENT

Chapter Highlights

Prior to the 1978 Title I statute, SEA enforcement sanctions were scattered throughout the Title I legal framework. Thus, state enforcement authority was unclear, which led to widely differing enforcement practices. Enforcement was defined by the State Management Practices Study to include audits and audit resolution, withholding of payments, and complaint resolution. The provisions for these enforcement sanctions (particularly auditing) are specified not only by the 1978 Title I statute and regulations but also by other applicable laws, regulations, and federal circulars and guidelines.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the audit, withholding, and complaint resolution provisions in the 1978 Title I law and subsequent regulations:

- To what extent did states implement these enforcement sanctions?
- To what extent did states change their enforcement practices as a result of these provisions in the 1978 law?
- What problems did states encounter in implementing the enforcement provisions?
- Did the enforcement provisions stimulate states to develop exemplary practices in this area?
- To what extent would states plan to continue these enforcement activities if there were no or minimal requirements for them to do so?

Some of the study's major findings are:

- While all states conducted fiscal audits, approximately only one-half of the states conducted program compliance audits. In a few states, monitoring served as the program audits. Uncertainty about whether program compliance audits were, in fact, required coupled with ED's differential enforcement of a state program compliance audit were the primary reasons for lack of state activity in this area.

- Independence of the auditor was a problem for states. Some coordinators were often not aware of their state's audit practices; others did not want to sound too knowledgeable about these activities else they might be criticized for not being independent enough. Some evidence suggests that, the greater the independence of the auditor, the less use of the audit findings by the state Title I staff.

- Districts tended to mirror their states' attitudes toward auditing--they tended to prefer fiscal audits to program compliance audits, in part, because the latter duplicated monitoring unnecessarily; and they felt that CPAs should not be used to conduct program compliance audits.

- While the 1978 Title I statute gave states the authority to withhold funds in cases of noncompliance, only one-half of the states reported never withholding funds. The most frequent enforcement sanction was a delay or suspension of funds to a particular district rather than demanding paybacks from the districts.

- Only nine states reported using compliance agreements, a new form of sanction recognized by the 1978 Title I statute. Other states that might have used compliance agreements did not do so, since they were unsure what this section of the statute really intended.

- Very few formal complaints were handled by states during the three-year period after the 1978 Title I statute was in place, and almost all complaints were resolved within the time periods specified by law. While states and districts still tended to receive and process complaints submitted "informally," these complaints were also few in number during the three-year period after 1978.

Under Chapter 1, states plan to continue enforcement sanctions as follows:

- Since program compliance audits will be required under Chapter 1, a transition to implementing these new procedures is currently in place in a number of states. However, almost one-half of the states would have preferred to use Chapter 1 monitoring staff--not auditors--to ensure accountability.

- Specific plans to withhold funds under Chapter 1 will depend, in part, on whether states feel they can extend their rulemaking authority provided in the Chapter 1 regulations to make a rule allowing them to withhold payments. While not all states used the withholding authority provided in the 1978 Title I law, many more felt that the "threat" of a withholding action was sufficient to keep districts in compliance with the law.

- Many states indicated that they would continue to use some sort of complaint resolution procedures under Chapter 1. Not all would keep complaint resolution procedures separate for Chapter 1 programs; reliance on existing state agency procedures to ensure consistency across all state programs was common. Increasing the flexibility of the requirements, including reliance primarily on informal rather than formal procedures, was also a frequent plan.

Introduction

> A fundamental tenet of a democratic society holds that governments and agencies entrusted with public resources and the authority for applying them have a responsibility to render a full accounting of their activities. This accountability is inherent in the governmental process.
>
> (House Committee on Education and Labor, 1979, p. 220)

Prior to the 1978 Title I Statute, SEA enforcement sanctions were scattered throughout the Title I legal framework. Thus, state enforcement authority was unclear, which led to widely differing enforcement practices. As noted by Gaffney, Thomas, and Silverstein (1977) in their indepth study of the Title I legal framework prior to the Education Amendments of 1978, enforcement could be interpreted broadly to include both informal and formal sanctions, such as application approval, monitoring, audit resolution, and complaint resolution.

In appropriating funds for ESEA Title I programs, Congress vested responsibility at three distinct levels for insuring that the requirements and, ultimately, the intent of the program were followed. The federal Department of Education was established as the grantor of funds requiring the development, monitoring, and enforcement of regulations that guide and direct program implementation by grantees (usually states) and sub-grantees (usually LEAs). States are similarly responsible for local school districts, and other sub-recipients.

This three-tiered administration shared the responsibility for preserving program purpose at all levels of involvement and provided for enforcement of compliance by a proximate and knowledgeable authority (i.e., states were the primary enforcers of LEA compliance thereby preserving the intent of the program legislation).

Preserving the intent of the program thus necessitated the accountability of program staff to their grantor, their public, and the Congress. A number of mechanisms were provided in the law for maintaining this accountability at all levels. Among these were application approval, audit and audit resolution, withholding of funds, and complaint resolution. While it may effectively be argued that enforcement alone has not caused the significant levels of compliance that have existed in the program to date, enforcement activities and the threat of sanctions for non-compliance have influenced program practices (Hill, 1979; Goettel, Kaplan, & Orland, 1977).

While states' actual management of their enforcement responsibilities has varied, there are activities common to most. These have been primarily based upon previous requirements, past good practices, and standards of quality within the audit profession. A state enforcement system may include procedures for:

- review and approval of state and local applications;
- financial and compliance audits of both recipient SEA and LEA activity;
- review and processing of LEA audit reports, including procedures for resolution of identified audit exceptions;
- requiring repayment or withholding of federal funds, depending upon the nature of the identified violation;
- resolution of complaints, which may inform the SEA of LEA non-compliance; and
- apprising the cognizant federal agency of major areas of non-compliance in SEA or LEA activity, especially in cases of waste, fraud, and abuse.

While not viewed by all states as an enforcement activity, SEA monitoring of sub-recipients may also inform state staff of problem areas, which, if not corrected, may be referred to audit staff for review.

This chapter treats enforcement as consisting of audits and audit resolution, withholding of payments, and complaint resolution. The findings of the State Management Practices Study will be presented in the discussion of each area.

Audits and Audit Resolution

The primary mechanism for Title I enforcement is the audit. Auditing of Title I projects has two primary purposes--to determine fiscal accountability and program compliance. Fiscal audits assure that federal funds are properly expended and accounted for. Program compliance audits determine that federal programs operate in conformance with applicable laws and regulations. A third purpose of Title I audits is to determine the efficiency and economy of program operations. The end result of an audit of federal programs usually includes (a) the determination of whether the financial statements are presented fairly in accordance with generally accepted accounting principles; (b) the determination of whether the organization is in compliance with federal laws and regulations; (c) recommendations for corrective action and for strengthening the management systems; and (d) a request for repayment of misspent funds, if necessary, commensurate with the exceptions noted.

Several documents have directed states' audit practices under Title I over the years. These are:

- General Education Provisions Act (GEPA) and regulations;

- P.L. 95-561 of 1978;
- OMB Circular A-102P of 1979;
- GAO's Standards for Audit of Governmental Organizations, Programs, Activities and Functions;
- GAO's Guidelines for Financial and Compliance Audits of Federally Assisted Programs;
- Education Division General Administrative Regulations (EDGAR) of 1980;
- 1981 Title I Regulations;
- OMB's Questions and Answers on the Single Audit Provisions of OMB Circular A-102, 1981; and
- OMB Compliance Supplement, 1980.

Each of these is briefly reviewed to provide historical perspective.

General Education Provisions Act (GEPA) and regulations. Prior to the enactment of the 1978 Title I statute, education administrators were bound by the audit requirements in the General Education Provisions Act (GEPA) and the General Provisions for Programs Regulations (GPPR), which contained general requirements applicable to all federally funded education programs.

Part 100b of GPPR related to state administered programs and included requirements for financial management and accountability, allowable costs, monitoring and reporting, and subgrantee compliance.

In 1973, 45 CFR, Section 100b.301(h) specifically required that audits be made by the state agency or subgrantee to determine fiscal integrity and compliance with applicable requirements of the grant or subgrant at least once every two years. While agencies that received federal funds had to be audited every two years, auditors needed only to sample the agency's transactions or programs, and Title I would not necessarily be included every time an audit was conducted of that agency.

Public Law 95-561. The 1978 Title I legislation, for the first time, contained specific requirements for audits of Title I within Section 170. Both the House and Senate reports on the 1978 Education Amendments to Title I discussed the NIE study findings of the SEA and LEA levels of non-compliance with audit requirements, particularly regarding the conduct of compliance audits. As a result, Congress decided to clarify and place within the Title I statute certain specific audit responsibilities (House Committee on Education and Labor, Report 95-1137, 1978; Senate Committee on Human Resources, Report 95-856, 1978).

Section 170 of the 1978 Title I statute directed states to provide for audits of Title I expenditures to determine fiscal integrity of grant and sub-grant financial transactions and compliance with applicable requirements. The 1978 law did not specify the frequency of audits. (This issue was later addressed by regulation.) States were required to establish procedures for timely and appropriate audit resolutions, including a process for repayment of misspent or misapplied funds. The 1978 statute further directed ED to establish standards for audit resolution procedures of states. In addition, Section 171 required states to submit to ED a monitoring and enforcement plan (MEP) that would specify the aforementioned procedures.

Audit Circular A-102, Attachment P. In October 1979, the Office of Management and Budget published "Circular A-102; Uniform Administrative Requirements for Grants-in-Aid to state and Local Governments, Attachment P-Audit Requirements" (referred to as A-102P). The attachment was a result of an initiative by then President Carter to improve the auditing of federally assisted programs through increased audit coordination between federal agencies and greater reliance on audits to be made by state and local governments. OMB Circular A-102P is a final policy of the Executive Branch of the federal Government and is directed at federal agencies. It communicates that it is the administration's policy that federal agencies require, through regulation, that state and local governments receiving federal funds have audits conducted in conformance with A-102P stipulations.

A-102P was not previously required of SEAs and LEAs through ED regulation; however, audits conducted in conformance with A-102P have been considered in compliance with audit requirements. As a result, some states already began to modify audit practices in terms of A-102P stipulations.

A-102P provides for independent audits of fiscal and program compliance on an organization-wide rather than grant-by-grant basis.

> Such audits are to determine whether (a) financial operations are conducted properly, (b) the financial statements are presented fairly, (c) the organization has complied with laws and regulations affecting the expenditure of federal funds, (d) internal procedures have been established to meet the objectives of federally assisted programs, and (e) financial reports to the federal Government contain accurate and reliable information.
>
> (44 FR 60959, 1979)

In further explanation of the compliance audit, A-102P requires an examination of the

> systems established to ensure compliance with laws and regulations affecting the expenditures of federal funds.
>
> (44 FR 60959, 1979)

In addition, the audit examination must determine whether

> Federal funds are being expended in accordance with the terms of applicable agreements.
>
> (44 FR 60959, 1979)

A-102P requires that audits be made at least every two years. SEAs and LEAs may arrange for independent audits and prescribe audit scope, consistent with A-102P, according to their own procedures. Any additional audit work beyond that required by A102-P, including federal audits, is to build upon work already done. A-102P contains further requirements relating to the audit report and the responsibilities of the federal agencies overseeing the audit functions.

Audit Standards. In addition to its own specifications, A-102P stipulates that audits be conducted in accordance with General Accounting Office's (GAO) Standards for Audits of Governmental Organizations, Programs, Activities, and Functions, (Comptroller General, 1981), the Guidelines for Financial and Compliance Audits of Federally Assisted Programs, (Comptroller General, 1980), any compliance supplements approved by OMB, and generally accepted auditing standards. The Standards for Audit, first published in 1972, provides background information and definitions of concepts and terms, and prescribes specific procedures, standards for quality work, and reporting guidelines. It describes three possible elements of audit scope: financial and compliance audit, economy and efficiency audit, and audit of program results. Most relevant to A-102P is the first, financial and compliance audit, and the definition contained within the Standards is consistent with that contained in A-102P.

The Standards for Audit provides little new insight toward an understanding of compliance auditing, repeating that the audit determines

> whether there is compliance with laws and regulations which could materially affect the entity's financial statements. (Comptroller General, 1981, p. 13)

While this is explained later in the publication, it still provides little information helpful in planning the scope of audits for individual programs.

> Specifically, the auditors are to satisfy themselves that the entity has not incurred significant unrecorded liabilities (contingent or actual) through failure to comply with, or through violation of, laws and regulations. (Comptroller General, 1981, p. 25)

As noted in the discussions of A-102P, it is left to the state or local government requesting an audit to determine and prescribe the specific scope of the audit prior to the start of audit. (The minimum requirements to be audited for compliance were later prescribed in the 1981 Title I regulations. In addition, both the House and Senate Reports on P.L. 95-561 in 1978 indicated that the minimum scope of Title I compliance audits should include target area selection, selection of children to be served, supplemental use of funds and prohibition against general aid.)

The standards contained in this GAO document also deal with auditor qualifications, independence, due professional care, and scope impairments. The issue of independence of the auditor, as prescribed by A-102P, has received a high level of attention by states.

> In all matters relating to the audit work, the audit organization and the individual auditors, whether government or public, must be free from personal or external impairments to independence, must be organizationally independent, and shall maintain an independent attitude and appearance. (Comptroller General, 1981, p. 17)

Independence is considered critical, not only in order that auditors' judgments and recommendations *be* impartial, but also that they *be viewed* as impartial by outside parties interested in audit results.

In addition to the detailed considerations of auditor independence presented within the *Standards for Audit*, the publication refers the reader to the AICPA Code of Professional Ethics.

Guidelines. *The Guidelines for Financial and Compliance Audits of Federally Assisted Programs* (Comptroller General, 1980) was the second document referenced by A-102P. The 1980 publication of the document (currently under revision) provided information to assist the auditor in planning the audit, studying internal control, and testing procedures for fiscal audit. The document provided several relevant appendixes, including a fiscal questionnaire and documentation guide, illustrative financial statements and OMB Circular A-102P. Particularly relevant to the foregoing discussions is the chapter on compliance audits. While the Guidelines repeated many of the definitions of compliance auditing previously cited, it went further in referencing requirements to be checked in determining compliance.

> Three of the most important requirements are recipient eligibility, coverage of services, and matching requirements. If funds are used to provide services not included in the grant award, ...the total amount of the award may have to be returned to the grantor agency.
>
> While these requirements may not cover all significant compliance requirements, they do include some of the most important ones and their verification at least would indicate that funds were used for their intended purpose... Other requirements that may be applicable include maintenance of effort, indirect cost rate determination, and allocation and cost principles. (Comptroller General, 1980, p. 9)

Since A-102P requires the conduct of audits in accordance with the Guidelines, states had to consider the above specifications in planning the scope of their audits.

EDGAR. In 1980, HEW published the Education Division General Administrative Regulations (EDGAR). These were subsequently renamed the Education Department General Administrative Regulations as a result of the Department of Education Organization Act.

Section 100b.700 required SEA and LEA compliance with applicable mandates, plans, and applications. Section 100b.702 required SEAs and LEAs to use fiscal control and fund accounting procedures that ensure proper disbursement of, and accounting for, federal funds.

Section 100b.702 also referenced 45 CFR Part 74, Subpart H, Standards for Grantee and Subgrantee Financial Management Systems. Section 74.61(h) required audits in conformance to GAO's Standards in order to examine, on an organization-wide basis, the fiscal integrity of financial transactions and compliance with the terms of the award for those programs tested. The regulation required audit frequency of once every two years, procedures for timely and appropriate audit resolution, and provision of audit reports to a regional HEW Audit Agency office. (45 CFR Part 74 has since been revised as 34 CFR Part 74, requiring implementation of A102-P audits.)

Section 100b.730 of EDGAR required both SEAs and LEAs to keep specific records, including those necessary to facilitate effective audits. In addition, Section 100b.731 required the retention of records which would demonstrate compliance with program requirements.

Title I regulations. In 1979, ED issued draft program regulations on the 1978 Title I statute. The issuance of regulations was delayed for several reasons. According to House Hearing records, the 1979 Notice of Proposed Rulemaking was delayed due to lack of clarity and existence of errors in the proposed regulations. These proposed regulations had been an attempt to write rules in "common sense," "non-bureaucratic" language. In an effort to be responsive to criticism of that method, a second Notice of Proposed Rulemaking was issued in 1980; these regulations were made final in January 1981. When issued as final regulations in 1981, they clarified and expanded upon the provisions of the 1978 legislation. President Reagan's administration, however, delayed the effective date of these regulations until 30 March 1981 to permit further review. Several requirements of these regulations were changed to "guidelines" as of the effective date. It is important to note that, during the time period 1978 until 1981, states also operated under directions received from ED through program directives, program reviews, and telephone conversations.

Section 200.190 of the 1981 regulations requires audits for both fiscal integrity and program compliance. Compliance audits were to include review of the following Title I requirements where applicable:

- designating school attendance areas,

- children to be served,
- fidelity of project to the LEA application,
- supplement, not supplant,
- prohibition regarding general aid,
- private school participation,
- comparability,
- maintenance of fiscal effort, and
- excess costs.

In addition, audits were generally to be conducted once every three years by independent auditors. Independence was defined as employed by the state but outside the Title I administrative unit or employed by a private firm that is supervised by the state.

Sections 200.191 through 200.196 relate to audit resolution, appeals, repayment, use of repaid funds, and collection actions.

Questions and Answers. OMB issued Questions and Answers on the Single Audit Provisions of OMB Circular A-102 in December 1981 that addressed several questions raised by A-102P. This document indicated that states are responsible for insuring that sub-recipients conduct audits in accordance with A-102P, reviewing LEA audit reports and taking any appropriate follow-up measures. Correspondingly, during an audit of the state agency, the auditor was to:

> a. review the recipient's [SEA] system for obtaining and acting on subgrantee [LEA and state agency] audit reports;
>
> b. test to determine whether the system is functioning in accordance with prescribed procedures; and
>
> c. comment on the recipient's [SEA] monitoring and disbursing procedures with respect to subgrantees [LEAs and state agencies, if warrented by the circumstances]. Reported questioned costs require consideration for materiality, possible adjustment of financial statements, and possible footnote disclosure. (OMB, 1981, pp. 5-6)

OMB Compliance Supplement. In August 1980, OMB issued a compliance supplement that provided guidance for audits of the 60 largest federal programs. With regard to Title I, the document described the authorization, objectives of the program and the major compliance features. Major compliance features included the uses of funds and use restrictions relating to instruction and services, applicant (SEA) eligibility, and beneficiary (LEA Title I programs) eligibility.

The impact of this multiplicity of audit mandates and guidance was confusion over required procedures of states and varied practices among the states. To complicate this problem, enforcement of audit requirements was inconsistent. For example, compliance auditing and independence of auditors were two long-standing requirements that were ignored by some states. In addition, many states previously questioned the applicability of A-102P requirements to their LEA Title I programs. States expressed frustration over past audit requirements and procedures. For Chapter 1 programs, however, the requirements for auditing sub-recipients are intended to reduce burden and increase coordination of audit activities.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of audit provisions included in the 1978 Title I law and subsequent regulations:

- How do state agencies conduct fiscal and program compliance audits?
- How have audit procedures changed since 1978?
- What problems has the audit provision created?
- Did the provision stimulate states to develop successful practices or materials?
- Are state and federal audits necessary? To what extent would states continue auditing, and what form would these efforts take, if audits were not required by federal law?

Title I projects operated under the 1978 Title I statute and regulations for a brief time when, as a result of a change in administrative priorities, the Education Consolidation and Improvement Act of 1981 (ECIA) was passed. Chapter 1 of ECIA replaces Title I of the Elementary and Secondary Education Act (ESEA) of 1965. In general, Chapter 1, like Title I, is designed to meet the special educational needs of educationally deprived children. However, Chapter 1 is intended to be less restrictive and to provide state education agencies and local education agencies greater flexibility than Title I. Consistent with the effort to increase state and local flexibility, the final Chapter 1 regulations do not prescribe specific methods for implementing each of the changes Chapter 1 makes to Title I requirements.

While the staff of the State Management Practices Study was well aware of the requirement that the audit function be conducted independently of the Title I unit, it was observed that states' practices varied regarding the level of involvement of the Title I coordinators in audit activities. Despite the fact that the Title I coordinators may have had uneven knowledge about auditing, the decision was made to interview all state Title I coordinators initially regarding their states' Title I-related audit practices and then follow up through later onsite interviews with auditors (where available) from a sample of states to obtain a more complete picture of practices.

Implementation

A variety of sources were used to collect data on states' audit practices:

- the initial telephone interviews with state Title I coordinators,
- the follow-up onsite interviews conducted in a sample of 20 states with a state-level auditor and with Title I personnel in up to five LEAs in the state,
- the state's Monitoring and Enforcement Plan, and
- any other relevant enforcement documents sent to AIR as part of its initial document review data collection effort.

It is not surprising that conflicts quickly arose between these data sources. States' original MEPs, for example, were occasionally out of date. While formal amendments to the MEP may have been made in some cases, coordinators sometimes indicated that changes were made locallly and not submitted to ED until requested to do so. Thus, practices reported in the MEP were not always accurate. Furthermore, not all states sent copies of their audit materials, so a review of the content contained in the documents was uneven across states.

In addition, numerous other problems were encountered in trying to collect information on auditing practices:

- Due to the independence of the auditor, the Title I coordinators frequently did not know answers to the questions being asked. On the other hand, a few coordinators did not want to sound too knowledgeable about the activities of their audit unit else they may be criticized for not being independent enough.
- Some coordinators were confused about whether program compliance audits were required and afraid to admit that they may not have been done.
- State practices were influenced by state laws or policies outside the control of the coordinators.
- In a few states, where the coordinators claimed that auditing was combined with monitoring, the Title I coordinators had difficulty answering the audit questions.

The primary issues raised by coordinators guide the initial discussion:

- program compliance audits, and
- independence of auditor.

The first part of this chapter summarizes the findings of the State Management Practices study to the audit questions listed above. Also included in this discussion are states' preliminary views of the impact of Chapter 1 and related requirements upon their future auditing activities and opinions of a sample of districts regarding their states' implementation of audit requirements. Also included in this chapter are discussions of the withholding of payments and complaint resolution enforcement sanctions.

The Issue of Program Compliance Audits

As discussed in the Introduction to this chapter, program compliance audits have appeared in several past requirements including General Provisions for Program Regulations, GAO's Standards and Guidelines, P.L. 95-561 and the Title I regulations, OMB Circular A-102P, and EDGAR. State Title I coordinators were queried about the scope of their compliance auditing. States varied in terms of program areas selected for audit as shown in Table 1. As might be expected, those program compliance requirements relating to financial management and designation of school attendance area requirements were more commonly audited. Those items starred (*) were required by the 1981 Title I regulations to be covered by audits of LEA programs.

Through the telephone interviews and reviews of states' documents, 43 states appear to have conducted some form of compliance auditing; 6 states appeared to have conducted no program compliance audits. While a total of 30 LEA requirements were audited by states, the majority of states audited only maintenance of effort, supplement not supplant, comparability, designating school attendance areas, and children to be served.

Unexpected was the extent to which program compliance audits have not been conducted according to the requirements. It was expected that a requirement as long-standing as this would have been implemented widely. Ten states, however, reported initiating compliance audits of Title I after the 1978 law, and at least thirteen states appear to have been out of compliance with requirements for compliance auditing during the Study's interviews.

Table 1

	LEA Requirements	# States Auditing
	Funds Allocation	
*	a. Maintenance of effort-126(a)	29
*	b. Excess costs-126(b)	16
*	c. Supplement not supplant-126(c)&(d)	32
*	d. Comparability-126(e)	29
	e. Exclusions from excess costs and comparability-131	4
	f. Limited exemption to supplement not supplant-132	1
	Targeting and Eligibility	
*	a. Designating school attendance areas-122	37
*	b. Children to be served-123	37
*	c. Private school participation-130	25
	d. Schoolwide projects-133	4
	Program Design and Planning-124,129,134	
	a. Requirements for design and implementation of programs-124	3
	1. Purpose of program-124(a)	
	2. Assessment of educ. need-124(b)	14
	3. Planning-124(c)	6
	4. Sufficient, size, scope, and quality-124(d)	6
	5. Expenditures related to ranking of project areas & schools-124(e)	8
	6. Coordination with other programs-124(f)	10
	7. Information dissemination-124(h)	9
	8. Teacher & school board participation-124(i)	10
	9. Training of education aides124(j)	15
	10.Control of funds-124(m)	13
	11.Construction-124(n)	5
	12.Jointly operated programs-124(o)	3
	13.Accountability-127	8
	14.Complaint resolution-128	6
	15.Individualized plans-129	6
	16.Noninstructional duties-134	8
	Evaluation	
	a. Evaluation-124(g)	10
	b. Sustaining gains-124(k)	6
	Parent Involvement	
	a. Parent involvement-124(j)	10
	b. Parent Advisory Councils-125	19
	Other	6

State coordinators expressed many complaints about program audits, generally focusing on three concerns. These concerns are presented below, followed by specific comments made by coordinators.

- Program compliance audits are unnecessarily duplicative of monitoring efforts and are of little benefit:

  We disagree with the concept of indepth compliance audits. It's unnecessary to audit all LEAs in addition to monitoring. The duplication creates paranoia among the local staff.

  State Title I staff do a better quality check, are more sensitive to local conditions, and provide better technical assistance than can auditors who are not educators.

  Program audits are not helpful in strengthening the program or its management. The cost is not worth it.

  Auditors' jobs overlap with monitors. Program audits are excessive and expensive, and some LEA requirements can't be audited, such as non-instructional duties and parent involvement.

  It doesn't make sense to take away money for some things, like problems with PACs.

- Program compliance audits are costly to LEAs and SEAs considering their outcomes:

  It's too expensive to do indepth compliance audits.

  LEAs complain about the expense of program audits.

  Since the program audits duplicate monitoring, it's a waste of money, especially in terms of travel costs.

- Fiscal auditors are inappropriate for the task of program compliance audits:

  CPAs don't know what they're doing in program compliance auditing.

  CPAs are not familiar with Title I.

  CPAs can't do program audits properly, so they are of no use at all.

The Issue of Auditor Independence

The independence of the auditor is a concept that appeared in early audit documents. The 1972 GAO Standards (referenced earlier) specified that such audits be conducted. Though not previously required of LEAs and SEAs, the specifications of OMB Circular A-102P (1979) served as guidance regarding proper auditing practices. Also in 1979, ED made independence a major issue by delaying approval of several states' MEPs, because the organizational structure responsible for Title I audits was not independent of the SEA unit administering the Title I program. This may, in fact, have been the first time many Title I coordinators took seriously the need to implement independent audits. Finally in 1981, the Title I regulations defined independence as outside the unit administering the Title I program.

Title I coordinators expressed many concerns associated with this requirement. These comments are presented below and are categorized in terms of their focus on the following related questions:

- Should independent CPAs and fiscal auditors be involved with compliance audits?

  Auditors are not educators and cannot bring that perspective to the task; auditors' opinions often interfere with educators. Auditors can't always resolve audit problems through suggestions and recommendations.

  Fiscal auditors don't want to do compliance audits.

  It may be fine for auditors to look at fiscal program requirements, but not at program design or targeting.

- How are independent auditors trained, especially for compliance auditing?

  Fiscal auditors receive only about six months of training to review educational programs when others, such as the Title I coordinator, have worked for years in the field as professionals.

  SEA has a guide of suggested tests of compliance, but you don't tell auditors what to do.

  Training auditors is difficult and time consuming.

- What costs are associated with independent audits at the local level?

  Title I equals two percent or less of some LEAs' budgets and never more than five percent. The audit is out of proportion to the impact.

  Auditing is not cost effective and CPAs are expensive.

- What costs are associated with independent audits at the state level?

> Our administrative setaside is the minimum ($225,000), and, without carry-over funds, it is difficult to pay the cost of CPA firms. Hiring CPAs to do fiscal audits of two-thirds of our LEAs would use over one-half of our administrative funds.
>
> We don't have enough money at the state level to contract with an audit agency.
>
> We get the minimum amount of funds for state administration. We don't have enough money and will have to let a program person go in order to pay an auditor. The program staff are a more important part of the program.
>
> We have insufficient funds to pay competitive wages to hire auditors at the state level.
>
> We can't comply with audit requirements because we don't have the funds. It is foolish for the federal government to think this state could comply. There just aren't enough funds available from the feds to do audits.

As might be expected from these comments, states' practices varied considerably in terms of implementation of the independent audit requirement. State Title I coordinators as part of this study were asked to discuss their implementation of these audit requirements, and how they addressed the provisions mentioned here. Questions probed the conduct of financial and compliance audits, independence of auditor, and frequency of audits. Each of these is discussed below.

How are Fiscal and Compliance Audits Conducted?

The areas receiving compliance audits were shown in Table 1. As mentioned previously, program compliance audits were a long-standing requirement, yet six states admitted that no program compliance audits were conducted.

A review of documents related to auditing indicated that the fiscal areas shown in Table 2, as a minimum, were audited by states.

Table 2

Fiscal Areas Audited by States

- General (organization, account maintenance, written procedures)
- Cash receipts and revenues
- Disbursements and expenditures
- Purchasing
- Receiving
- Accounts Payable
- Payroll and personnel (time)
- Property and equipment (fixed assets)
- Indirect costs
- Balance sheets
- Cash on hand and on deposit
- Investments
- Bonds payable
- Students' deposits
- Auxiliary enterprises (dorms, food service, stores)
- Obligations outstanding

Independence of the Auditor

Independence of authority conducting the audit. The different types of groups given the authority to conduct fiscal and compliance audits are shown in Table 3.

Table 3

Authority Conducting SEA Fiscal and Program Compliance Audits

	Audit Type	
Audit Authority	Fiscal Audits	Program Compliance Audits
CPA Firms	16	5
Title I Unit	0	7
State-level Units	19	20
Combination[a]	14	11
None Conducted	0	6

---

[a] Combination refers to those states that shared the audit responsibility among two or more parties, including CPA firms, state auditors, the SEA, or the Title I unit.

States were distributed fairly evenly in terms of the authority conducting fiscal audits, with slightly more states using staff from state-level units. Of the 43 states conducting program audits, over one-half used state-level staff (including Title I staff), and in only 5 states were audits locally conducted by CPA firms. The state-level unit could include permanent SEA or Title I staff, consultants hired by the SEA, or personnel in a state audit agency.

Seven states reported using staff from the Title I unit to conduct program compliance audits. It is the Study's understanding that this practice was not in conformance with the requirement of independent auditing for state Title I personnel to conduct program audits. However, when interview respondents indicated that the Title I unit performed audits, this response was counted as reported rather than counting the response to mean that no legal program audits are conducted.

Independence of authority paying for the audit Independence can also be obtained by examining who pays for audits as shown in Table 4.

Table 4

Authority Paying for Audits

	Type of Audit	
Payer	Fiscal Audits	Program Compliance Audits
LEAs Contribute or Pay in Full	27	11
State (including SEA) Pay in Full	19	25

Table 4 suggests that, while LEAs tend to contribute funds or pay in full for fiscal audits, states were more likely to pay in full for compliance audits.

From Tables 3 and 4 it is evident that states implemented the independence requirement differently. For fiscal audits, it appears that about one-half of the states took the primary responsibility for audits upon themselves, and about one-half shared this responsibility with their districts. For compliance audits however, it appears that, in most cases, the state has assumed primary responsibility.

Independence and assisting LEAs. The question was raised as to how the locus of responsibility for conducting audits relates to specific management activities. Interview data and document reviews indicated that the Title I staff in 17 states helped prepare their LEAs for audit.

These activities included:

- disseminating a memorandum regarding documents and personnel to be available at the time of audit,
- providing an audit guide for LEA review prior to the audit, and
- conducting a pre-audit onsite check by monitoring staff to identify and remedy problems prior to the audit.

Independence and use of the audit report. Title I units in 35 states used the information contained in the LEA audit reports to make changes to program management. This was especially true for states that took the responsibility upon themselves for the conduct of audits. Table 5 depicts the relationship between the authorities conducting audits and the extent to which their findings were used.

Table 5

Use of Audit Reports by State Program Managers

SEA Uses Audit Report	Fiscal Audits Conducted By			Program Audits Conducted By		
	CPA	State	Combination	CPA	State	Combination
No	4	1	3	2	2	0
Yes	8	18	9	3	22	9

If it is assumed that locally conducted CPA audits represent greater independence from the Title I unit than do audits conducted by state-level personnel, it appears that one effect of increased independence is that audit results are less likely to be used by state program staff as a management tool. This may indicate a need to develop mechanisms at the state level for reviewing CPA audit reports. This finding is also supported by the attitudes among Title I coordinators toward CPAs and fiscal auditors conducting program audits as reported earlier. The extent to which audits and their findings were used as a basis for program management is explored later in this chapter.

Independence and training of auditors. Another state management activity that is related to the locus of responsibility for audits is the training of auditors. Table 6 presents the ways in which their auditors were trained.

Table 6

SEA Training of Title I Auditors

Training of Auditors	Number of States
Active Training	27
Passive Training	35
On-the-Job Training	11
Hired Experienced Personnel	16
No Training	1

Over one-half of the states conducted active training, which referred to formal structured workshops or training sessions focused on the Title I program. Almost three-quarters of the states provided passive training, which included activities such as providing an audit guide, Title I law, or regulations to auditors without structured training meetings or encouraging informal conversations between new auditors and monitors familiar with Title I. Some states used combinations of training methods, which accounts for the large number of responses presented. Only one state admitted providing no training to auditors of Title I programs.

Based upon the comments made by Title I coordinators in interviews regarding problems with having fiscal people do program audits, the following two hypotheses were made:

- states would have a greater interest in actively training CPA firms than their own state-level staff, and
- states would focus active CPA training on program compliance auditing.

As shown in Table 7, the data are consistent with both hypotheses.

Table 7

Relationship Between Authority Conducting Audits and Active Training

Active	Fiscal Audits Conducted By			Program Audits Conducted By		
Training	CPA	State	Combination	CPA	State	Combination
No	5	10	7	1	14	2
Yes	11	9	7	4	13	9

It appears, then, that the locus of responsibility does have an affect on management decisions related to training.

Independence and audit findings. Coordinators were asked how often they recouped misspent funds and how they reallocated these funds. A number of state Title I coordinators provided no information in this area, primarily due to their lack of information, since this independent function was not administered under their direction. The number of LEA repayments in the last year and in the last three years are shown in Table 8.

Table 8

Number of LEA Repayments of Federal Funds Resulting from Audits

Last Year	Number
None	19
1-10 (few, occasional)	17
Over 10 (several)	5
Don't Know/No Answer	8
Last Three Years	
None	14
1-20 (few, occasional)	16
Over 20 (several)	5
Don't Know/No Answer	14

The data in Table 8 indicate that few audits result in repayment for audit exceptions. Almost one-third of the states had not requested repayment of funds identified by audits as misspent or misapplied since 1978, and almost 40 percent had not requested repayment over ten times in FY 1981. Only a small number of states requested repayment over ten times in FY 1981, or over twenty times since 1978. While repayment is only one type of corrective action that may result from audits, it is encouraging to note such low levels of documented fiscal non-compliance among LEAs.

Table 9 presents the number of repayments as a function of the responsibility for audit. Since auditors were considered by coordinators to be "more objective" but "too rigid" and "inflexible," it was hypothesized that greater numbers of exceptions would result from CPA audits.

Table 9

Fiscal Audits Resulting in Repayment as a Function of Type of Auditor

Type of Auditor	Repayments Last Year None	Repayments Last Year Some	Repayments Last 3 Years None	Repayments Last 3 Years Some
CPA	9	6	8	6
State	6	10	3	10
Combination	4	6	3	5

The data actually suggest that the opposite appears to be true: Repayments are more likely when fiscal audits are conducted by state staff--not CPAs. While the interrelationship between repayments and the type of program auditor were less significant, the direction of the relationship was the same.

When coordinators were asked about the reallocation of misspent/repaid funds, the most frequent response (N=14) was that states try to combine these funds at the state level for rebudgeting or redistribution to LEAs using the Title I allocation formula. Eight states reported returning the funds to the original LEA (the one who repaid the funds), and six reported returning them to ED. Choice of action may depend upon the nature of the exception and whether the non-compliant project remained operational until after the resolution of the audit findings. Ten states reportedly had no experience with reallocation of repaid funds due to lack of audit exceptions resulting in repayment.

Repayment was related to the locus of responsibility as shown in Table 10. These data indicate that, when funds are repaid to ED, states are more likely to conduct the fiscal and program audits themselves.

Table 10

Repayment of Reallocated Funds as a Function of Type of Auditor

Funds	Fiscal Audits Conducted By			Program Audits Conducted By		
Go To	CPA	State	Combination	CPA	State	Combination
LEAs	7	9	6	13	10	1
ED	0	6	0	1	5	0

This finding is consistent with the finding reported earlier; when local audits are conducted by CPAs, there is less likelihood of repayment for exceptions and less likelihood of returning funds to the federal government.

Independence and the frequency of audits. As previously discussed, the law requires that audits be conducted at least once every three years. Table 11 shows frequency of auditing for both fiscal and program compliance audits.

Table 11

Frequency of SEA Audits

Frequency	Fiscal Audits	Program Compliance Audits
At least once every year	22	9
At least once every two years	5	5
At least once every three years	16	18
Other	6	10

Fiscal auditing tended to occur at least once every year, but about one-third of the states used a three-year cycle. In program compliance auditing, more states used a three-year cycle than any other pattern. Six states in fiscal auditing and ten states in program compliance auditing varied their schedule of audits based upon factors such as LEA size, but these patterns generally incorporated a three-year cycle.

Relating the frequency of audits to the locus of responsibility, the data indicate that, among states where the LEAs contribute to or pay in full for the cost of the fiscal audit (N=27), over one-half (N=15) conduct annual fiscal audits. However, among states that contribute to or pay in full for the cost themselves, only one-third (N=8) conduct annual fiscal audits. The data on program audits showed no relationship between frequency and locus of responsibility.

Summary of findings pertaining to independence issue. The data presented thus far suggest that, the more independent the auditor (CPAs conduct local audits or LEAs contribute to the cost of the audit), then

- the greater the likelihood that fiscal audits will be conducted annually,
- the greater the likelihood that the state will provide active training,
- the greater the likelihood that there will be no repayment of funds due to audit exception,
- the less likely it is that there will be funds returned to the federal government, and
- the less likely the state is to use the report of audit findings.

These trends should not be overinterpreted, however, due to the caveats cited in the introduction to this chapter.

Based upon comments made during interviews, the issue of auditor independence has been a major source of problems for the coordinators. At the time of the interviews, ECIA had just been passed and most states were unaware of future audit requirements. It is now known that OMB Circular A-102P will be enforced under Chapter 1 and independence of the auditor will be required. This suggests that a major area of need for technical assistance to the states will be in the area of independent audits.

Value of Auditing

Auditing the use of federal funds is inherent in accountability for the public trust. In addition, some states feel that valuable information is generated by this activity which they can use as a good management tool. While state coordinators more frequently complained of the burdens of auditing, they were specifically asked to comment on those aspects of the activity that positively affected their program management.

The extent to which audit findings are used as a basis for other SEA responsibilities is shown in Table 12.

Table 12

Coordination of Auditing with Other SEA Responsibilities

Audits Used as a Basis For	Number of States
Technical Assistance	30
Application Approval	30
Monitoring	28
Changes to SEA Management	16
Changes to LEA Management	8
Other Changes	9

A majority of the states reported using the content of audit violation as a basis for providing technical assistance, for approving LEA applications and for conducting monitoring activities. About 25 percent of the states, however, said that they do not take audit violations into consideration when carrying out their other SEA responsibilities.

Examples of the ways in which audit findings are used by the Title I coordinators as a basis for providing technical assistance are illustrated by some of their comments:

> We look carefully at audit reports for LEA needs.
>
> Our state auditors provide assistance in bookkeeping and fiscal issues.
>
> We've provided special assistance on supplement, not supplant and comparability because of auditing findings.
>
> We've worked closely with the LEAs to prevent further misuse of funds.
>
> Problem areas identified in audits have been used as examples for presentation in LEA workshops.
>
> We use the findings to decide where to focus SEA energy.
>
> We briefed a new LEA Director on problems which occurred in audits during the previous LEA administration.
>
> We use examples of violations in other states' LEAs for inservice with our LEAs.

Ways in which audit findings are used in the application approval process are:

> We examine LEA applications to find problems in areas of weakness identified by auditors.
>
> LEA applications are not approved until outstanding exceptions have been resolved.
>
> We have required more documentation in the LEA application of travel and inservice training spending because of past audit findings.
>
> Problems follow a pattern and other LEAs are likely to experience ones similar to those identified by audits. We look closely at all LEA applications for those common problems.

Examples of the use of audit findings in monitoring are:

> As a result of past audits, we now check on monitoring visits to see what records LEAs are keeping.
>
> We've developed a monitoring self-assessment instrument based on what we learned from past audits.
>
> Our monitors review the audit findings when they go onsite.

More states indicated that the audit findings were used to make changes to their program management (N=16) than to make changes to their districts program management (N=8).

Ways in which audit findings were used to change state management include:

> We developed and implemented LEA self-assessment monitoring as a pre-audit activity.
>
> We've sent SEA specialists to LEAs identified in the audit as having problems.
>
> We give LEAs with audit problems more attention.
>
> We've tried to improve our procedures and increase our recordkeeping proficiency as a result of audit findings.
>
> We've sometimes changed our ideas of what's practical to expect of the LEAs based on what we see through auditing has worked in the districts.

Changes to LEA management are reflected in the following comments:

> Our LEAs keep better records now than when auditing began.
>
> LEAs know what to expect in the audit and examine themselves more closely.

> LEAs now take audits seriously and prepare for them.
>
> We don't have to tell the LEAs much. They learn a lot just going through the audit process.

Congress had intended that a strong state enforcement authority was necessary to maintain the supplemental nature of the program (Gaffney, Thomas, & Silverstein, 1977). Because auditing was a key part of states' enforcement systems, it was expected that auditing would strengthen program administration. Thus, states were asked whether they felt auditing had, in fact, strengthened their program management.

Most of the states (N=32) felt that SEA audits strengthened their administration of Title I, commenting that it made SEA staff more responsible and conscientious. Specific comments made by coordinators are categorized as follows:

- Auditing improves LEA programs and increased compliance, accountability, and recordkeeping (N=21). Sample comments are:

  > Audits identify where federal money has been wrongly spent and increases accountability and compliance among LEAs.
  >
  > Auditing has resulted in tightened control of fiscal procedures.
  >
  > Schools expect the audit and it keeps them on their toes to manage their programs more efficiently.
  >
  > Auditing results in programs that border on compliance.

- Auditing promotes smooth program management (N=12). Sample comments are:

  > State program administration was not taken seriously until audits began.
  >
  > The feedback from audits helps LEAs with their program administration.
  >
  > Without the audit or threat of audit, our management practices would be looser.

- Auditing helps the SEA oversee LEAs and helps identify problems (N=7). Sample comments are:

  > The Title I unit examines problem areas in order to head off similar problems in the future. We have to use the policeman role occasionally.
  >
  > Audits give the SEA insight into the local program and tells us a lot about what's going on.

> Audits give the state the opportunity to examine problem areas and provide technical assistance.

Prior to data collection, it was hypothesized that positive attitudes toward the value of auditing would correlate positively with specific audit activities. In particular, states that felt audits strengthen their program administration might be more likely to report greater numbers of audit activities. While these states were more likely to use the findings from the audit to make changes to their program administration as show in Table 13, no other relationships between attitudes and activities were observed.

Table 13

Attitudes Regarding Strengthened Administration Among States Using Audits for Management Change[a]

Audits Used As Basis for SEA Management Changes	Audits Strengthen Administration No	Yes
No	7	7
Yes	1	7

States that felt auditing strengthened their program management are characterized as small in terms of numbers of LEAs and the numbers of SMSAs greater than 25,000. They are unusual in that they currently spend a large amount of all staff time on program design issues (approximately 30 percent) and would like to spend even significantly greater amounts of time in the future on program design (43 percent). The close association in these states with monitoring is evident, as they report spending more time in monitoring and less time on technical assistance activities than do other states.

Another factor that was expected to have an effect on state audit practices was the extent to which state Title I coordinators felt ED had helped them in carrying out their audit responsibilities. Seventeen states felt that ED had helped them to carry out their state auditing activities. State Title I coordinators applauded ED's assistance in redesigning existing audit procedures and staff's availability to answer states' questions. Some were appreciative of ED's flexibility in enforcing states' compliance with audit requirements. An equally large number of states (N=17) felt ED had neither helped nor hindered their efforts in auditing. In contrast, seven states said that they felt ED had hindered their efforts. Some of this latter group of states cited that ED had held up their initial MEP approval due to their state audit procedures as a reason. A few others complained about ED's lack of flexibility in enforcing audit requirements. Individual responses included complaints of lack of direction and assistance with designing audit procedures, lack of written clarification and conflicting verbal statements, discrepancies between the directions of program office staff and federal auditors, and criticisms of the prescriptive law and regulations with insufficient funds to implement them. One state did not ever consult with ED regarding auditing. Despite the fact that some states felt very strongly in their belief that ED was not helpful to them to implement their audit activities, these negative responses apparently did not detract from their feelings that the audit responsibility strengthened their program management. This relationship is shown in Table 14.

Table 14

Relationship between an Auditing Attitude and the Perceived Helpfulness of ED[a]

	Helpfulness of ED			
Audits Strengthen Program Administration	Hindered	Helpful	Somewhat Helpful	Neither/Not Consulted
No	2	1	2	4
Yes	4	1	12	14

---

[a] Data from nine states are missing.

More negative attitudes toward ED were consistently associated with the cases where states contributed to the cost of the audit. These crosstabulations are shown in Table 15.

Table 15

Perceived Helpfulness of ED Among Authorities Paying for Audits

	Fiscal Audit Costs Contributed By		Program Audit Costs Contributed By	
ED Helpfulness	LEAs	SEAs	LEAs	SEAs
Hindered	1	6	0	6
Slightly Helpful	2	0	1	0
Helpful	12	2	3	7
Neither/Not Consulted	7	10	2	11

From this table it is evident that states are much more likely to feel ED hindered their efforts when they (as opposed to their districts) contributed to the cost of either fiscal or program audits. Part of the reason for this finding may be due, in part, to the fact that some states believed that the increase in amount of funds for state administration (from one to one-half percent) was sufficient to keep pace with the rate of inflation and not sufficient to assume the greater financial auditing responsibilities.

Finally, a third factor that was felt to have an impact on audit practices was the amount of time spent on auditing activities. The amount of staff time devoted to auditing was expected to vary as a function of its perceived importance by coordinators. This relationship is presented in Table 16.

Table 16

Time Spent on Auditing Activities as a Function of its Perceived Importance[a]

Rating of Importance	Median Time Spent	Low	High	Number
Little or No Importance	2.0	0	10.0	11
Moderate Importance	10.0	0	31.0	19
Substantial Importance	2.2	0	10.0	18

---

[a] Data from one state are missing.

Thus, it is apparent from Table 16 that, despite a high importance attached to auditing, some coordinators spend little, if any, time in this area. Part of the reason for this difference may be due, in part, to the independence of the requirement. It is also the case that some coordinators rated the provision as being of substantial importance, but, due to the fact that their LEAs conducted their own fiscal audits, for example, they tended to spend less time in this area.

Changes to Auditing Practices

As discussed earlier, the 1978 statute was the first time audit procedures were specified within the Title I law. While several audit requirements had existed prior to 1978, many states only began to implement them after 1978. The state Title I coordinators were asked how their audit procedures had changed with the advent of the 1978 Educational Amendments. Most states (N=34) felt that their activities had changed with the amendment to the law. Of those states that experienced change, 23 states felt that the law resulted in the introduction of new procedures, such as separate audits in Title I, use of independent auditors, or the conduct of program compliance audits in Title I. An additional 10 felt that their existing audit procedures had only been redesigned, clarified, improved, or expanded to include Title I audit requirements. These design changes were reported to have increased costs for 12 states, increased staff size in 15 states, and resulted in increased frequency of audits since 1978 for 5 states.

Those states reporting either introduction of new procedures or redesign of procedures primarily used their state agencies to conduct program audits. However, these two groups differed in how they carried out their fiscal audits as shown in Table 17.

Table 17

Changes to Audit Practices as a Function of Authorities Conducting Fiscal Audits

	Fiscal Audits Conducted By		
Changes to Audit Procedures	CPA	State	Combination
None	4	6	6
Introduction of New Procedures	11	7	5
Procedures Redesigned	1	6	3

It appears from this table that most of the states implementing new procedures hired CPAs to conduct fiscal audits, while those that reported redesigning their procedures relied on their state agencies to conduct fiscal audits.

States that introduced new audit procedures after 1978 were also much more likely to have their LEAs contribute to the costs of fiscal audits as shown in Table 18.

Table 18

Changes to Audit Practices as a Function of Authorities Paying for Fiscal Audits[a]

Changes to Audit Procedures	Fiscal Audit Costs Contributed by LEAs	Fiscal Audit Costs Contributed by SEAs
None	8	6
Introduction of New Procedures	15	8
Procedures Redesigned	4	5

---

[a] Data from three states are missing.

This relationship was not unexpected due to the previous finding that introduction of new procedures was associated with the use of CPAs to do the audits.

Auditing Problems

Thirty-eight of the coordinators reported that they had encountered problems in carrying out their auditing responsibilities. Problems with the requirements themselves were reported by 13 coordinators; and problems with implementing the requirements (e.g., paying auditors competitive wages, training auditors, recouping misspent funds) were reported by 17 coordinators. A large number of coordinators (N=28) reported general dissatisfaction with the auditing requirement--it was too burdensome, not useful, or disruptive.

The states reporting problems with the auditing provision also tended to report spending significantly more time on both the monitoring and audit provisions than did other states. These states indicated that more than one-third of all staff time was spent on these two areas, whereas the remaining states reported spending one-quarter of their time between monitoring and auditing.

While most states did report problems, states that felt ED hindered them or did not actively support them to carry out their audit provisions, were more likely to report problems as shown on Table 19.

Table 19

Audit Problems as a Function of Perceived ED Helpfulness

Presence of Audit Problems	Helpfulness of ED Hindered	Somewhat Helpful	Helpful	Neither/ Not Consulted
No	1	0	3	5
Yes	6	2	12	13

---

[a] Data from seven states are missing.

Presence of problems, however, was not related to whether states had positive attitudes about auditing or whether they felt audits strengthened their program administration.

Exemplary Practices

State Title I coordinators were asked if they had developed any practices or materials with which they were particularly pleased and that could be shared with other states. One-half of the states (N=24) felt they had none, some adding that, due to the uniqueness of each state, little that they had developed would be valuable to other states. Respondents did identify a few practices, such as comprehensive procedures (N=5) and auditor training methods (N=3), and materials, such as guidelines (N=4) and handbooks (N=9). These successful practices and materials were compiled into a management module on Enforcement (Putman, 1982) that accompanies this report.

The states reporting production of exemplary prarctices were much more likely to report a greater fiscal contribution by their LEAs in the area of both fiscal and program audits as shown in Table 20.

Table 20

Production of Exemplary Practices as a Function of Authorities Paying for Fiscal and Program Audits

Production of Exemplary Practices	Fiscal Audit Costs Contributed by LEAs	Fiscal Audit Costs Contributed by SEAs	Program Audit Costs Contributed by LEAs	Program Audit Costs Contributed by SEAs
No	12	11	2	13
Yes	11	3	7	6

Since many of the materials appeared to have a training focus, it is, perhaps, not unexpected that states should develop materials for their LEAs to use when hiring and training auditors.

States were also more likely to report developing exemplary practices and materials when they felt ED was supportive of their auditing efforts as shown in Table 21.

Table 21

Production of Exemplary Practices as a Function of Perceived Helpfulness of ED[a]

Production of Exemplary Practices	Helpfulness of ED: Hindered	Helpful	Somewhat Helpful	Neither/ Not Consulted
No	4	1	6	13
Yes	1	1	7	2

---

[a] Data from 14 states are missing.

As is apparent from the table, those states reporting exemplary practices tended to have much more positive interactions with ED over auditing issues, whereas the other states had more neutral and even negative relationships.

Continuation

At the end of the auditing section of the interview, states were asked whether they would continue to audit if there were no or minimal legal requirements for them to do so. Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As part of the interviews conducted onsite to a representative sample of 20 states, state-level personnel were queried specifically about their continuation plans under Chapter 1. By this time, Chapter 1 requirements were a little better understood, and state coordinators were beginning to make plans as to what aspects of their Title I practices would or would not be included as part of Chapter 1 management.

The discussions on continuation plans is presented in two parts. The speculative answers provided by the 49 Title I coordinators during the telephone interviews will be summarized and interpreted first. The information obtained from the 20 state Title I coordinators in response to specific probes about their auditing plans under Chapter 1 will conclude this chapter.

Auditing Plans: A Speculation

To assess the state Title I coordinators' perceptions of the importance of auditing and the future of the activity, they were first asked whether state and federal audits are necesssary. Most (N=38) felt that state audits are necessary activities; a lesser number felt that federal audits (N=28) are necessary. Some of these felt that, while audits of LEAs were needed, this responsibility should rest with the states, not the federal government.

On the basis of their answers to the entire auditing section of the interview, coordinators were classified as having auditing attitudes as follows:

- positive toward fiscal audits, positive toward program audits (N=16),
- positive toward fiscal audits, negative toward program audits (N=27), and
- negative toward fiscal and program audits (N=5).

One state could not be classified. These attitudes reflect controversy mentioned throughout this chapter regarding the merits of fiscal and program audits.

Continuation of fiscal audits was reported by 42 states; continuation of program audits was reported by 15 states. If auditing were not a requirement for states, only four states felt they would not conduct audits, two saying they could not unless it was a federal requirement. In addition, three of these four reported general dissatisfaction with the audit provisions of P.L. 95-561. This trend also held true among states that did not consider state audits necessary. While some problems may have been expressed by those states planning to continue auditing, most were not generally dissatisfied as a result of their experiences with auditing.

The 42 states that would plan to continue fiscal audits believed maintaining fiscal accountability was important to ensure that Title I funds are spent for their intended purposes. The level of frustration that Title I coordinators experienced in implementing program audits is reflected by the fact that only 15 states said they would continue program compliance audits: another 19 stated strongly that they would not plan to continue program audits. This latter group of states also expressed general dissatisfaction with the audit provisions.

Other audit continuation plans reported by states that they might make if audits were not required include:

- rely on monitoring rather than program compliance audits to ensure accountability (N=20);
- rely on state laws or rules for audits (N=13);
- modify certain audit procedures, such as repayment methods or conduct of onsite visits (N=6);
- place less overall emphasis on auditing (N=6);
- rely on LEA general education audits that also include Title I programs (N=5); and
- audit certain programs only, such as those programs with a history of problems, programs in large LEAs, or those programs requesting audits (N=4).

A sizable number of state Title I coordinators (N=35) also indicated that there were other enforcement sanctions that could be used in addition to or instead of auditing. These sanctions are listed in Table 22.

Table 22
SEA Enforcement Sanctions Other Than Auditing

Other Enforcement Sanctions	Number of States
Use Monitoring	28
Use Withholding, Compliance Agreements, and Repayment of Funds	7
Use Technical Assistance	5
Use State Authority, Rules, Laws	11
Use General LEA Audits	6
Use Federal Auditors	2

Most preferred to use monitoring to enforce requirements of Title I. This comment is understandable, because monitoring has traditionally been under the control of the state Title I unit, while auditing has not. Fourteen states indicated clearly that they would not want the federal government auditors to replace the state auditors and fulfill the SEA audit function.

These data indicate that, while coordinators feel that fiscal accountability is important, they prefer to use their own Title I program monitors for program review and improvement.

The four states indicating that they would not plan to continue auditing were also the states classified as having the most anti-auditing attitudes mentioned above. They felt that neither fiscal nor program compliance audits were necessary. The states with positive attitudes toward fiscal auditing but negative attitudes toward program audits generally reported an interest in enforcement sanctions other than auditing to ensure compliance with the program.

Auditing Plans: Preliminary Views of Chapter 1 Impact

The multiplicity of past audit mandates resulted in a variety of attitudes toward auditing. Much of the negative comments regarding auditing may be attributed to the confusion that resulted from inconsistent enforcement of audit requirements, as well as lack of knowledge among coordinators of this independent activity.

Follow-up interviews subsequently conducted onsite in 20 states provided an opportunity to discuss specific auditing plans under Chapter 1. Both the Title I coordinators and their auditors, where available, were queried about their future plans.

Most states (N=19) indicated that they would continue fiscal auditing: Only one state was unsure whether or not fiscal audits would continue. Only a small number of states (N=6) indicated they would continue program audits; the remainder responded negatively or were unsure of future plans in this area. This result is not unexpected for several reasons:

- Most state Title I coordinators (N=32) had less than positive attitudes toward program audits.
- In the absence of federal audit requirements, few (N=15) states indicated they would continue program audits.
- The regulations for ECIA and the revised EDGAR regulations, which required implementation of OMB Circular A102-P, had not been released as of the date of the interviews. Thus, based upon the language of ECIA, several states thought that they would no longer be required to conduct program compliance audits.

It is now apparent that A102-P audits will be enforced for federal program auditing, including Chapter 1 programs. Unstructured follow-up contacts with a small sample of coordinators indicated that plans are currently underway in some states for implementing A102-P. Based upon the data presented here, and the requirements for A102-P described in the introduction to this chapter, further changes to states auditing practices are expected. The four primary stipulations in A102-P are:

- independence of the auditor,
- frequency of audits to be at least every two years,
- conduct of financial and compliance audits, and
- implementation of the single audit concept.

The changes to states' audit practices that are necessary for them to become in compliance with A102-P are discussed below. Informal communications with coordinators after these interviews were conducted suggest that many have already begun the transition. One state is knows to have complied with all A-102P requirements and is currently in its third year of implementation.

Independence of the Auditor

While all states apparently used auditors independent of Title I staff to conduct fiscal audits, this was not the case for program audits: Seven states reported that their Title I units conducted program com- pliance audits, and six reported conducting no program compliance audits at all. Among the remaining states, 36 conducted compliance audits with staff outside the Title I unit. These data indicate that audit practices in 13 states must be modified to obtain conformance with the independence of auditor standard in A-102P.

Frequency of audits. In 28 states, fiscal audits were conducted at least every two years as stipulated in A-102P. The remaining 21 states used a three-year cyle for fiscal audits.

Of the 43 states conducting program compliance audits, 14 scheduled audits at least once every two years. In 28 states, program audits were carried out less frequently, and, in one state, a determination regarding frequency of audits could not be made.

In the future, 21 states must increase the frequency of fiscal audits, and, in order to comply with A-102P, program audits must either increase in frequency or begin for the first time in 35 states.

Fiscal and program compliance audits. All 49 states interviewed conducted financial audits. Only 43 of these also reported conducting program audits. In the future, six states must begin compliance audits in order to comply with A-102P.

Single audit concept. It appears from the document review that most states conducted audits on a grant-by-grant basis. While this determination was difficult to make, based on the available data, at least five states apparently conducted organization-wide audits. This finding suggests that as many as 44 states may need to modify their practices to conform to the A-102P stipulation of the single audit concept.

Auditing: A District Perspective

A sample of 98 districts were queried about their states' audit practices. Approximately 35 districts could not answer the questions, since they had not gone through a fiscal or a program audit (or were not sure they had) during their tenure as Title I coordinator.

Of those coordinators who did have audits, they were asked who conducted them. Their answers for the conduct of both fiscal and program audits are shown in Table 23.

Table 23
LEA Perspective of Authority Conducting Audits

Audit Agency	Fiscal Audits	Program Audits
CPA Firms	22	10
Title I Unit	0	9
SEA Unit	11	9
Other State-level Unit	7	5
Combination	9	3

Table 23 indicates that most LEAs received fiscal audits by CPA firms. In nine districts, the state Title I office apparently conducted program audits, which is not in compliance with the independence of auditor requirements of A-102P. In addition, more program audits were conducted by the state (N=23) than by CPAs in those LEAs interviewed.

Table 24 presents the frequencies with which LEAs interviewed were audited.

Table 24
LEA Perspective of the Frequency of Audits

Frequency	Fiscal Audits	Program Audits
Once Every Year	40	19
Once Every Two Years	7	4
Once Every Three Years	1	5
Varies	0	1

The LEAs interviewed tended to report that they were audited annually. These data also support those gathered from state Title I coordinators.

In order to understand the attitudes of districts toward auditing, they were asked a series of questions on the effects of state auditing practices. Nineteen districts reported that audits did not lead to changes in their own program management, while fourteen LEAs experienced management changes based on audits of the district.

LEA were also asked what they liked best and least about both fiscal and program compliance auditing. Table 25 displays LEA opinions of fiscal audits.

Table 25

LEA Attitudes Toward Fiscal Auditing

Attitude	Number of Districts
Positive	
• Accountability, Legality, and Accuracy Ensured	36
• Benefits Program	20
• Creates No Problems	9
Negative	
• Burdensome for Staff	17
• Procedures Problematic	13
• CPAs Unqualified	9

More LEAs responded positively than negatively regarding fiscal audits. Most commonly, districts were happy to have outside review and verification of legal use of funds and accurate recordkeeping. Second, districts felt that they learn from the process, identify problem areas, and value recommendations made by fiscal auditors.

Those displeased with fiscal audits felt that the process was time consuming, disruptive, and anxiety provoking. Problems with audit procedures focused on the instruments used for fiscal audits, the cost of auditing, and the timing of the reports summarizing audit findings after the close of the program.

Table 26 summarizes districts' opinions about program compliance audits.

Table 26

LEA Attitudes Toward Program Compliance Audits

Attitude	Number of Districts
Positive	
• Accountability, Legality Ensured	22
• Good Procedures	8
Negative	
• Duplicates Monitoring	11
• Burdensome for Staff	11
• CPAs Unqualified	11
• Other Problems	4

While fiscal auditing was generally viewed favorably by LEAs, program audits received more negative criticism than positive. Remarks made by the coordinators who felt that program audits were burdensome for staff included descriptions of auditing as time consuming, disruptive, and anxiety producing. Other problems cited dealt with repayment for exceptions, the problem that the audit findings did not reflect program operation, and problems with auditors' opinions differing from those of the state Title I staff.

Districts were then asked ways in which their states may improve the auditing process. Their responses are summarized in Table 27.

Table 27

Ways in Which States Can Improve the Audit Process

Response	Number of Districts
Fiscal Audit	
• Change the Process	16
• Change the Staff	10
• Change the Frequency	6
• Increase Technical Assistance	3
Program Compliance Audit	
• Change the Process	7
• Change the Staff	8
• Change the Frequency	2
• Use Monitoring/Title I Unit	4
• Eliminate the Process	4

As Table 27 suggests, changing audit procedures was frequently mentioned by LEAs as the way in which their states could improve the process. Simplifying the process, regionalizing auditing, improving the consistency of audits, improving the timeliness of findings, coordinating Title I audits with those of other programs, and increasing LEA responsibility for the conduct of audits were all suggested by LEAs.

Changes in staffing always referred to the qualifications of CPAs conducting audits. LEAs felt fiscal CPA auditors needed further training, and that CPAs should not be used for compliance audits at all. This same issue--that of fiscal CPAs trying to conduct program audits--was also mentioned as a problem by the state Title I coordinators.

Changes preferred by districts in the area of auditing frequency most commonly meant a decrease. Only one LEA felt fiscal audits should be conducted more frequently.

While 11 districts reported that program auditing duplicates monitoring, only 4 of these actually recommended replacing the process with monitoring conducted by the state Title I unit.

Finally, four districts felt that the termination of program audits was the only way to improve the system. No such comments were made with regard to fiscal audits.

When asked if auditing should be continued by their states if not required by federal law, 46 LEAs suggested continuing fiscal audits and only 2 suggested termination. However, only 26 LEAs recommended continuation of program compliance audits; and 15 districts recommended that they be discontinued. Districts were also asked how helpful they felt their states had been to them with regard to state audits of districts. These findings are summarized in Table 28 for both fiscal and program audits.

Table 28

Districts' Opinions of Their States' Helpfulness in Auditing

Perceived Helpfulness of States	Fiscal Audits	Program Audits
Hindered	1	3
Helpful	34	28
Neither	16	5

Despite the fact that many districts had such negative comments about some aspect of state audit practices, they clearly tended to believe that their states tried to help them in this area.

Withholding of Payments

A second component of the enforcement system is the responsibility to withhold payments of federal funds in the case of violations of applicable law and regulations.

The 1978 Title I statute provided that a state agency notify the LEA of its intention to withhold part or all of the LEA's future funding, after opportunity for a hearing, due to non-compliant activities. Withholding would continue until the SEA was satisfied that the LEA was in compliance, or until there was in effect a compliance agreement which specified the terms and conditions under which the LEA would achieve compliance.

The 1981 Title I regulations elaborated on the procedures for withholding, provided for suspension of payments, and permitted the SEA to return withheld funds to the same LEA upon achievement of compliance or reallocate the funds to LEAs in greatest need if the non-compliant LEA remains in violation of law. The regulations further describe the use of compliance agreements in order to avoid the withholding action. The compliance agreement may be used only for current violations, and must include details of the violation(s), actions necessary to achieve compliance, and a schedule for resolving the violation(s) within 90 days.

It is important to note that the LEA may not be held liable for repayment of funds spent during the existence of the agreement on non-compliant activities specified in the agreement (i.e., once the compliance agreement begins, the SEA can no longer withhold funds or request additional repayment for funds spent during the existence of the agreement for the violations covered in the agreement).

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the withholding of payments provision included in the 1978 Title I law and subsequent regulations:

- To what extent have states withheld funds? To what extent have states used compliance agreements?
- To what extent did states change their withholding practices as a result of the 1978 Title I law?
- What problems did states encounter in implementing the withholding provision?
- Did the withholding provision stimulate states to develop exemplary practices in the area?
- To what extent would states plan to continue withholding payments if there were no or minimal requirements for them to do so?

States operated under the 1978 statute and 1981 regulations for a brief time, when Chapter 1 of the Education Consolidation and Improvement Act of 1981 was passed.

Chapter 1 includes no withholding authority for states, only for ED. In addition, there is no applicable section of GEPA identified by the State Management Practices Study as giving the SEA authority to withhold payments. However, Section 200.59 of the proposed regulations implementing the Chapter 1 program for LEAs contains the following provision regarding state rulemaking:

> In accordance with state law, the state or an appropriate entity thereof, may adopt rules, regulations, procedures, guidelines, and criteria regarding the use of Chapter 1 funds, provided that those rules, regulations, procedures, guidelines, and criteria do not conflict with the provisions of--
> (a) Chapter 1;
> (b) The regulations in this part; or
> (c) Other applicable federal statutes and regulations.

Current interpretation by ED on this point suggests that states do have the authority to adopt reasonable rules relating to auditing and withholding of payments.

Implementation

The person who held primary responsibility for withholding of payments was most often the state Title I coordinator, often in consultation with other Title I staff (N=18). In ten states, the Chief State School Officer (or, in a few cases, the State Board) was responsible for withholding of payments, often at the recommendation of the Title I unit. In the remaining states, primary responsibility for withholding of payments lay with the Associate Commissioner or Division Director (N=6), the Title I coordinator with approval from the Chief or Division Director (N=5), or with non-Title I staff, such as staff from a Fiscal or Audit Division (N=2).

State Title I coordinators report spending, on the average, less than one percent of all staff time on withholding of payments. This is not to suggest that withholding of payments is not considered important by the coordinators, but because many of them use withholding only as a last resort to bring LEAs into compliance. In fact, when the coordinators were asked how important the withholding provision was to maintaining the purposes of the Title I law, 15 coordinators felt it was of little or no importance, while the remaining coordinators felt it was of moderate importance (N=17) or of substantial importance (N=16).

Aproximately one-half of the Title I coordinators interviewed (N=21) stated that their state never withheld Title I funds from districts. Many states apparently did delay or suspend funds through stopping future payments (N=14), as opposed to demanding paybacks from districts. The average number of times Title I funds were withheld in the last year according to 42 coordinators was 3.6 (SD=11.4, range from 0 to 66). In the last three year, the average number of times funds were withheld was 8.2 (SD=24.4, N=41, range from 0 to 143). Of the states that do reallocate withheld funds, some reallocate funds to LEAs other than the ones where the funds were withheld (N=9), while, in other states, funds are reallocated to the same LEAs after a period of time (N=7).

Twenty-nine Title I coordinators said their withholding activities had not changed since the 1978 law. This is consistent with the finding that, on the average, less than one compliance agreement had been used per state (Mean=.9, SD=2.3, N=37, range 0-12 per state), since the compliance agreement was a new form of sanction recognized in the 1978 law. All compliance agreements reported were used in only nine states, and they were used for a variety of reasons. Compliance agreements had been used to address problems with misuse of teacher aides, comparability, or excess cost problems, to help ensure response to the state's monitoring report, to encourage sending in delayed audit reports, and to address violations with state rules. Most compliance agreements were resolved by the districts coming into compliance (N=10) rather than by the state withholding funds (N=2).

Most Title I coordinators (55%, N=42) felt that the withholding of payments provision did strengthen their administration of the Title I program. When asked to explain their answer, many said the withholding provision gives the SEA power, authority, clout, leverage, or a legal basis (N=14), while others said the provision would come in handy if needed and it does serve as a deterrent or threat whether or not it is used (N=9). The remainder of the coordinators said the withholding provision has had negligible impact (N=7) or that they felt they always had the power to withhold payments anyway (N=5), regardless of the provision.

The Title I coordinators were asked the extent to which they used the content of the violations for which they withheld payments as a basis for providing technical assistance, in the application approval process, in monitoring or auditing, or in any other way. Nineteen of the coordinators responding said they use the content of violations in providing technical assistance, twenty-one said they use the content of violations in paying more attention to the application approval process, and approximately twenty coordinators said the content of violations were used for more indepth monitoring or for audit checks. Thus, most of the coordinators do not see a commonality of problems across other areas of state responsibility.

Problems

Very few Title I coordinators (N=4) reported having any problems with the withholding of payments provision. Three of the four reporting problems with the provision mention practical considerations, such as increased recordkeeping and paperwork and an increased workload. Problems related to what a "compliance agreement" really means and lack of understanding of the limitations of Section 169 of the law were also specifically mentioned.

Payments were most frequently withheld for violations of the funds allocation and targeting provisions as shown in Table 29.

Table 29

LEA Requirements for which Payments were Withheld

LEA Requirement	Number of States
Funds Allocation	
• Maintenance of Effort	7
• Excess costs	2
• Supplement not supplant	8[a]
• Comparability	6
Targeting and Eligibility	
• Designating school attendance areas	3
• Children to be served	4
Program Design and Planning	
• Assessment of educational need	1
• Sufficient size, scope, and quality	3[a]
• Control of funds	1
• Construction	1
• Noninstructional duties	1
Evaluation	
• Evaluation	4
Parent Involvement	0

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[a] These items were mentioned as being a "major" problem by at least one state Title I coordinator.

It was expected that a supportive relationship with ED might be associated with fewer reports of problems. The majority of state coordinators said either that they did not consult with ED regarding the withholding of payments provision, or that ED was neither helpful nor hindering in this area (N=27); only seven coordinators felt ED helped them in this area. Because of the small numbers involved, no relationship between the perceived helpfulness of ED and reports of problems in this area was apparent.

Exemplary Practices

State Title I coordinators were asked whether they had developed any practices or materials in this area with which they were particularly pleased and that they could share with other states. Only seven coordinators mentioned developing practices with which they were particularly pleased. These included a reallocation process, a well documented five-stage compliance system, and a public hearings process.

Continuation

Almost all coordinators agreed that, if there were no enforcement sanction in the law for withholding payments, they would include some as part of their program management (N=34). Seven coordinators said they would use it, because they like or need the authority when dealing with some of their LEAs. Ten coordinators, however, indicated that use of withholding as an enforcement sanction depended upon the presence of a federal/state mandate or approval from state policymakers.

Although most coordinators preferred to have the law regarding withholding of payments unchanged, a sizable number (N=27) felt they could enforce compliance in other ways. Ten coordinators said they could enforce compliance through persuasion, threats, coercion, or bluffing; six suggested enforcing compliance through current activities, such as monitoring or auditing; and three suggested withholding approval of LEA applications. Three coordinators, however, felt that withholding of payments is the best or most effective way to enforce compliance.

Withholding of Payments: Preliminary Views of Chapter 1 Impact

State Title I coordinators from a sample of 20 states were queried specifically about their plans to use withholding of payments as an enforcement sanction under Chapter 1.

Most of these coordinators (N=14) felt that they would continue to use withholding as an enforcement sanction, while the remaining (N=6) states indicated they would not or that they were unsure of their plans.

States that planned to continue to use withholding felt strongly that withholding helped strengthen their program management. Some of the comments made by the Title I coordinators include:

> States have the right and the obligation to stop any activities that are illegal or educationally unsound.
>
> Withholding is a useful threat. We will use it in the most extreme circumstances to effect compliance.
>
> Withholding, in some cases, is the only way to bring schools into line.
>
> If you slap the wrists of an LEA once, the others will stay in line.
>
> Withholding of payments is the only leverage a state has to change procedures.

Those states that were unsure of their future use most often cited uncertainty over a perceived lack of federal mandate in this area. In one state, the coordinator expressed frustration over the state's perceived lack of authority in this area. This coordinator said:

> I hope LEAs do not push too hard in this area. While a precedent in the state does exist for a noncompliance action to mean "no money," the precedent was backed by both State Board rulings and federal law. If withholding is not allowed, what do I do with my large LEAs? After I try enforcing with bluffing and coercion and fail, what next?

Only after the interviews were conducted, however, did the study staff learn that ED's interpretation of the rulemaking provision added to the Chapter 1 regulations extended to the use of withholding of payments.

Comments made by the states indicated that they would not use withholding of payments under Chapter 1 include:

> We never used it under Title I and won't start now. We will work out problems before they get to the withholding stage.
>
> We don't plan to withhold payments, because there are fewer things to withhold payments for.

Other than the possibility that states may not be able to withhold funds without an express federal mandate, only two coordinators anticipated problems in carrying out their withholding actions. They both cited problems caused by lack of SEA staff and resources that would be needed to get a procedure into place and then to carry through with it.

Complaint Resolution

A third component of the SEA enforcement system under Title I is the SEA requirement to adopt written complaint resolution procedures. While not always associated with enforcement, the statute referred to these resolution procedures as a mechanism to acquire information regarding violations of Title I or other applicable GEPA provisions by receiving complaints and complaint appeals from LEAs. Procedures were to include timelines for resolution, onsite investigation (if necessary), an opportunity for hearing, right of appeal to ED, and dissemination of such procedures to interested persons, including parent advisory councils.

The 1981 Title I regulations provided further guidance in this area, specifying SEA resolution of complaints within 60 days (under normal circumstances) or referral to the appropriate LEA within 30 days. The regulations also described the content of an SEA final resolution and provided for appeal procedures to ED within 30 days of receipt of the SEA's decision.

The State Management Practices Study began collecting data from state Title I coordinators in Summer 1981 to examine the impact of the complaint resolution provision included in the 1978 Title I law and subsequent regulations:

- To what extent did states use the provision to resolve complaints?
- What problems did states encounter in implementing the complaint resolution provision?
- To what extent would a model complaint resolution procedure be useful to states?
- Did the complaint resolution provision stimulate states to develop exemplary practices in this area?
- To what extent would states plan to continue a complaint resolution procedure if there were no or minimal requirements for them to do so?

States operated under the 1978 statute and 1981 regulations for a brief time, when Chapter 1 of the Education Consolidation and Improvement Act of 1981 was passed.

Regarding future SEA responsibilities, the SEA complaint resolution requirement is absent from both the Chapter 1 statute and the final Chapter 1 regulations. However, adoption of complaint procedures at the SEA level is not inconsistent with the intent of Chapter 1.

Implementation

State Title I coordinators report spending less than one percent of all staff time resolving complaints. Only five coordinators, however, felt that inclu- sion of a complaint resolution provision in the law was of substantial importance in maintaining the purposes of Title I, while the remaining felt it was of little or no importance (N=18) or of moderate importance (N=24).

Title I coordinators were asked during the telephone interview how many informal and informal complaints they had received in the last year only and the number received since 1978. Formal complaints were defined to refer to formal, written complaints only, while informal complaints were defined to be complaints received through other channels, such as by telephone or by informal letter. Only 1.3 formal complaints (SD=3.3, N=47, range from 0 to 20) on the average and 7.2 informal complaints (SD=11.6, N=39, range from 0 to 50) on the average were reported received during the last year. An average of 2.6 formal complaints (SD=6.1, N=46, range from 0 to 40) and 24.7 informal complaints (SD=39.4, N=38, range from 0 to 150) were reported received since 1978. Given these figures, informal complaints were much more common than formal complaints, as should be expected. It also appears that the frequency of both types of complaints remained fairly stable since 1978, although during the last year there appears to have been a slight increase in formal complaints matched by a slight decrease in informal complaints.

Of all the complaints received, only nine coordinators reported that any of their complaints took longer than 60 days to resolve; most (N=26) reported that all complaints were resolved within 60 days. Where resolution took longer than 60 days, special cases were noted. For example, in one instance, a complaint had been filed prior to 1978, and, because it was still pending after the 1978 law, the complaint had to follow procedures prescribed by 1978 law. The complaint had been filed, received a hearing, been rejected, and been appealed by the local group at the local and state levels many times over a three-year period. At the time of the interview, the complaint was still under resolution.

Complaints may have been resolved at the SEA level (N=30), the LEA level (N=8), or by the federal Department of Education (N=9). Only four coordinators said they currently have complaints pending resolution.

Twenty-two states indicated that at least one complaint was referred to them by ED. Many fewer coordinators reported having any experiences with the federal education appeals board (N=11).

A sizable number of states said their state agencies had a state law or other written policy for resolving complaints, and 20 of these were in existence before the Title I requirement was added in 1978. Of the states that said their state does not have a state law or other written policy for resolving complaints (N=11), eight also said their state had never used the Title I complaint resolution policiies. In at least two cases, the state agencies adopted the Title I complaint resolution procedures as part of their state policies.

The Title I coordinators were asked if they used the content of the complaints in providing technical assistance, in the application approval process, in monitoring, or in any other way. Twenty-six coordinators said they use the content of the complaints in providing technical assistance, eighteen indicated they used the content of the complaints in tightening up the application approval process, and twenty-three reported using the content of the complaints as a basis for providing more indepth monitoring in those areas.

Problems and Usefulness of Models

When asked "Has the complaint resolution provision created problems for you?" 17 coordinators responded in the affirmative. The specific problems mentioned varied. Some of the problems mentioned were the paperwork involved, a lack of "smooth" or structured process for dealing with complaints, a fear concerning complaints that bypass the state Title I coordinator and go directly to ED first, and a concern that complaint resolution has caused unnecessary bureaucratic involvement at all levels.

The LEA requirements that either were the content of local complaints or that caused problems for the state coordinators in processing the complaints are shown in Table 30.

Table 30

Complaint Resolution: Content and Problem Areas

	Complaint Resolution		
LEA Requirement	Content Areas: Formal	Content Areas: Informal	Problems
Funds Allocation			
• Maintenance of effort	0	2	1
• Excess costs	0	4	1
• Supplement, not supplant	3	7	2
• Comparability	1	1	1
Targeting and Eligibility			
• Designating school attendance areas	3	5	1
• Children to be served	5	6	1
• Private school participation	3	10	0
• Schoolwide projects	0	1	0

Table 30 (continued)

Complaint Resolution: Content and Problem Areas

	Complaint Resolution		
LEA Requirement	Content Areas: Formal	Content Areas: Informal	Problems
Program Design and Planning			
• Purpose of the program	1	1	0
• Assessment of educational need	3	1	0
• Planning	1	1	1
• Sufficient size, scope and quality	3	2	0
• Expenditures related to ranking of project areas and schools	0	1	0
• Coordination with other programs	1	1	0
• Information dissemination	1	1	0
• Teacher and school board participation	1	0	0
• Training of education aides	1	1	0
• Control of funds	2	0	1
• Accountability	2	1	0
• Noninstructional duties	1	5	1
Evaluation			
• Evaluation	1	1	0
Parent Involvement			
• Parent participation	7	7	1
• Parent Advisory Councils	7	7	1

It is apparent that most of the complaints occurred in the areas of funds allocation (namely supplement, not supplant), targeting and eligibility (namely private school participation), and parent involvement.

The Title I coordinators were fairly equally split in terms of whether or not they thought it would be helpful to have a model complaint resolution procedure (20 said yes or maybe; 21 said no). Responses to this question were extremely variable, ranging from responses like "the legislation is clear and a model is not necessary" (N=2) to comments like "a guideline is OK but not a prescription" (N=5) or "a model is good as long as it is not long and complicated" (N=5).

Exemplary Practices

Few coordinators (N=14) reported that they had developed any successful practices or materials in the area of complaint resolution with which they were particularly pleased that could be shared with other states. Most of them, however, referred to their own state's complaint resolution procedures. The only exemplary materials really mentioned was a training package with transparancies, documents, and role playing exercises relevant to resolving complaints.

Continuation

Most Title I coordinators (N=34) reported that they would plan to continue using complaint resolution procedures as part of their program management, even if the law does not require it. Eleven coordinators were adamant about this fact, indicating that they would continue as in the 1978 legislation regardless. Five state coordinators said they would continue as in the 1978 legislation, but without the provision allowing a complaint to go directly to the federal level. Another group of coordinators indicated that, without requirements in federal law, they would rely on their own state's due process statutes or procedures. Five states were willing to set up more informal processes or to accept LEAS procedures in this area. Finally, three coordinators said that they would do whatever their Chief State School Officers wanted.

Complaint Resolution: Preliminary Views of Chapter 1 Impact

Specific continuation plans for the use of complaint resolution procedures under Chapter 1 were asked of a sample of 20 state Title I coordinators during subsequently conducted onsite interviews. Fifteen of these coordinators felt that they would continue to incorporate formal or informal complaint resolution procedures in their program management; five were either unsure of their plans or planning not to continue using complaint resolution procedures.

Comments made by the coordinators desirous of continuing complaint resolution procedures in their program management include:

> We will continue as before (resolving complaints) to maintain peace and harmony between the public and local school districts.
>
> We will use current procedures. It's a good idea to have a structure in place inhouse--we're better protected in case of law suits.
>
> We will keep our same procedures, although we have not used them much. The large cities, though, are political enough that they, too, need procedures of their own, regardless of the law.
>
> It is comforting to the public to know that we do have a complaint resolution procedure, although we've practically never received any complaints.
>
> A complaint resolution procedure is in line with our philosophy to permit opportunities for the people to be heard.

Some of the coordinators who planned to continue formal resolution procedures (N=5) planned to rely on their state-developed, (not Title I specific) procedures in the future. They felt their state agency-wide procedure was more effective than a procedure that might differ program by program.

The three states that were unsure of their future continuation plans cited lack of a federal mandate and lack of state authority to require districts to follow written complaint procedures as their primary reasons.

The reactions of two states that planned not to continue with their complaint resolution procedures include:

> This is a trivial issue.
>
> The less said about it, the better.

For both states, the state coordinators had felt that the procedures were used inappropriately in their states by some local individuals or groups that were trying to force a point with the local administrators. Since no other avenue to file complaints was perceived by these individuals as available, they decided to use the Title I complaint procedures that were accepted and made known to the public. The state coordinators were frustrated over the fact that much time and effort had been wasted to resolve formally submitted complaints that were only marginally related to Title I programs. The LEA requirements of "program purpose" and "sufficient size, scope, and quality" apparently were defined vaguely enough by the statute that any groups willing to file general complaints were able to use areas such as these for the basis of their complaints.

It may be due, in part, to situations such as these, or to the amount of paperwork generated by the Title I complaint resolution provision that prompted 12 coordinators to plan to modify their procedures under Chapter 1. While five planned to utilize their state-agency procedures as indicated above, others planned to loosen some of the current requirements as follows:

- relax the time lines (N=2),
- rely primarily on informal (not formal) complaints (N=2),
- require only that LEAs--not the SEA--have complaint resolution procedures (N=1), or
- encourage LEAs to have their own procedures (N=1).

One coordinator indicated that he thought the contents of the complaints under Chapter 1 would differ in that more would be filed by parents and PACs in order to keep their voice in the Chapter 1 program issues.

Only one coordinator anticipated that he would have any problems with continuing to have some sort of complaint resolution policy. Lack of staff time to intermesh the Title I policies with those of the state was used as the primary problem.

PART FOUR: Chapter 1 – A Forward Look

I do not say that the Federal Government should take over responsibility for education. That is neither desirable nor feasible. Instead, its participation should be selective, stimulative, and, where possible, transitional.

John F. Kennedy
The White House
29 January 1963

I have been asked whether States are prepared to take over greater responsibility for administering some of the programs. Perhaps a dozen years ago some of the states would not have possessed the competence or qualified personnel. Today the picture is different.

John Ashbrook
House of Representatives
10 August 1981

The Congress declares it to be the policy of the United States to continue to provide financial assistance to state and local education agencies to meet the special needs of educationally deprived children,...but to do so in a manner which will...free the school of unnecessary Federal supervision, direction, and control...The Congress also finds that Federal assistance for this purpose will be more effective if education officials...are freed from overly prescriptive regulations and administrative burdens which are not necessary for fiscal accountability and make no contribution to the instructional program.

Declaration of Policy
Chapter 1 of Education
Consolidation and
Improvement Act of
1981

Introduction

The Omnibus Budget Reconciliation Act (Public Law 97-35) was signed into law 13 August 1981. Title V, subtitle D, the Education Consolidation and Improvement Act (ECIA) of 1981, includes in Chapter 2 a consolidation of approximately 30 educational programs; Chapter 1 contains the intent of the former ESEA Title I program but with fewer prescriptions. What is significant about this piece of legislation is that, first, it did not follow the reauthorization process that was expected--the usual program hearings conducted by Congressional authorization committees such as those described in this report prior to the reauthorization of the Title I program in 1978 were circumvented by the budget reconcilation process; and, second, the entire process took place in an extremely short period of time for legislation, namely six months.

Rumors of "consolidation" and "block grants," which were prevalent during the six months prior to the passage of ECIA, were stimulated by messages included in President Ronald Reagan's Program for Economic Recovery that was submitted to Congress on 18 February 1981. In part seven of this proposal, plans for consolidating elementary and secondary education programs were proposed:

> The Administration proposes to consolidate all or part of over 45 Federal and secondary education programs into two "block grant" programs--one to the States and one to Local Education Agencies (LEAs). Such block grants will shift control over education policy away from the Federal Government and back to State and local authorities--where it constitutionally and historically belongs.
>
> Existing multiple program requirements are burdensome, inflexible, unresponsive, and duplicative, resulting in waste of resources at all levels of government; the block grant approach will eliminate such unneeded Federal rules. The Federal role is to supply necessary resources, not to specify in excrutiating detail what must be done with these resources.
>
> Under block grants, there will be no requirements for matching funds and no demands that Federal funds "supplement rather than supplant" local funding. There will be no endless byzantine squabbles over myriad accounting regulations that aid bureaucrats, not children. Approximately 13% of the Federal funds in programs to be consolidated are now used for administrative expenses by State and local agencies. This overhead will be drastically reduced under the consolidation proposal.

The feelings in this message against unnecessary federal rules and multiple program requirements are quite strong. Federal intrusion into the educational area, traditionally the purview of state and local education agencies, must end. These sentiments were later echoed by Secretary Terrel Bell in his statement to Congress on 29 April 1981, which accompanied the proposed Elementary and Secondary Education Consolidation Act. In this statement, Bell traced the history of federal involvement:

> In the beginning, the needs, the money, the children, and the control of education were all State and local. Too much of the money and the control shifted to Washington in that process...For the past 15 years, the Federal government has tried, with varying degrees of success, to administer patchwork legislative programs tailored to fit an ever-growing list of unmet needs...On behalf of well intentioned programs, the government slowly entangled the money, the needs--and American education itself--in a web of federal laws and rules...I am proud to be part of an historic effort by the Reagan Administration to put things back where they belong, at the local and State level. The Education Consolidation Act of 1981...represents a dramatic step toward restoring education to the people.

Bell recognizes that one of the reasons why the federal government became so involved was the failure of states and locals to address adequately the needs of the disadvantaged in the first place.

> Some may say that in years past local and State governments defaulted in their responsibilities to the poor, the minorities, the handicapped students, and that's why the Federal government wove its web in the first place. Be that as it may, the quality of education today offers no glowing evidence of the magical powers of the Federal government, despite years of massive effort. I am confident that some of these aid programs, like Title I of the ESEA, did make a difference, but I am confident also that these benefits would have been gained more effectively if the state and local education agencies had been given more flexibility.

However, he expressed the belief that state and local education agencies have been strengthened in recent years "not only in their capacity to identify and resolve education problems but in their commitment to do the job."

The assumption was made that states and locals would adopt the social goals previously held by the federal government as their own, namely to provide education to the beneficiaries of these programs, in exchange for more flexibility and less regulation.

In this April 1981 proposal, the ESEA Title I program was to be consolidated into a block grant for special needs populations, which included handicapped children, children in schools undergoing desegregation, migratory children, children in institutions for neglected or delinquent, and adults lacking basic skills in addition to educationally disadvantaged children. To the critics who argued that withdrawal of the federal role would result in the demise of educational programs for the special needs populations, Secretary Bell stated in his transmittal letter to the Honorable Thomas O'Neill, Speaker of the House of Representatives (28 April 1981) that the federal government was not abandoning accountability:

> While this bill represents a change in approach to Federal assistance, it does not retreat from national objectives. It is not general aid or revenue sharing. The proposed legislation directs benefits to the same students with special needs as under present laws...Removal of Federal fiscal limitations will encourage integrated educational services for children based on their needs rather than separation of services for accounting purposes.

This proposal, however, occasioned much discussion over the accountability issue. Opponents argued that, by combining educationally disadvantaged and handicapped children into one piece of legislation, the educationally disadvantaged children would lose. Thus, they felt that the administration's original view--that all children included in the bill would receive services as before--was naive given the political strength of particular advocacy groups.

In the final version of the education law, which was passed in August 1981, Title I was kept as a separate categorical program but was "stripped of those detailed requirements and instructions on how to conduct programs which caused most of a staggering five million hours of paperwork each year just to administer the program at state and local levels" (Representative John Ashbrook, 10 August 1981). The desire to reduce unnecessary paperwork and to return control of education back to the states and local school districts while still maintaining the social goal of the federal government to attend to the needs of special populations was met in ECIA of 1981.

Over the year since Title I became Chapter 1, much uncertainty existed as to whether its strengths outweighed its weaknesses. While "flexibility" and "greater creativity in management" were considered advantages by many, they were offset for others by the uncertainties caused by budget cuts and potential audit exceptions over interpretations of vague legal language.

The change to Chapter 1, which occurred during the midst of a two-year study of state administration of the ESEA Title I program, occasioned an opportunity to assess preliminary views of the new legislation. While information on how states administered the Title I program as it existed as a result of the 1978 Education Amendments was collected from 49 state Title I coordinators during lengthy telephone interviews, preliminary views on Chapter 1 were collected from a national sample of 20 coordinators and their state-level policymakers during subsequently conducted onsite visits. The 20 states that were included in this sample are: Arizona, California, Colorado, Delaware, Kansas, Louisiana, Massachusetts, Michigan, Mississippi, Missouri, New York, North Carolina, Ohio, Oregon, South Dakota, Texas, Utah, Vermont, West Virginia, and Wisconsin. These states were selected to be representative of states on the dimensions of allocation, urban-rural location, and numbers of districts.

The interviews, which were conducted from Fall 1981 to early Spring 1982, were directed to assess the strengths, weaknesses, and anticipated effects of the new legislation. The Chief State School Officers (or a designated replacement), state-level officials with a broader perspective than the Title I coordinators (generally a person responsible for several federal or state programs), plus the Title I coordinators were interviewed in these states. This chapter summarizes the preliminary reactions of these state officials to ECIA, and Chapter 1 in particular. Since ECIA had not yet taken effect, it is to be emphasized that the comments presented here are initial reactions only, which might change once Chapters 1 and 2 are fully implemented.

These early reactions varied tremendously regarding the intent and effects of the new law, which makes an overall summary difficult. Some individuals truly supported the new legislation, while others decried its existence. As might be expected, more global reactions came from those higher up in the state education agencies: Federal Program Coordinators had more reactions to specific changes in the law than did the Chief State School Officers, and the Title I Coordinators were more specific about their reactions to particular parts of the new law than were Federal Programs Coordinators.

A major concern of interviewees related to the proper role of the state, and hinged on the meaning of of the concept of "local control." Agreement is lacking on whether states are "local" and thus should step in to take on the role the federal government assumed in the past, or whether control should now rest at the district level with a minimal role being played by the state. States differed on whether they should model their behavior after the federal government and back out of the picture as much as possible, or whether lessening of a federal presence gives them the opportunity to exercise creative state level management in order to achieve the purposes of the legislation.

States were concerned with the new federal role in education, or lack thereof, particularly as it relates to accountability and audits. Uncertainties existed as to whether the federal government will step in at a later point and judge states by standards that have not yet been made explicit. For these reasons, many interviewees requested rather specific federal guidelines to be issued.

Each group of interviewees expressed different concerns and these will be summarized in the sections that follow.

Initial Reactions to ECIA Expressed by Chief State School Officers

The Chief or a designate of the Chief was asked about his or her reactions to the new education law. In particular, the discussions focused on the following questions:

- What do you feel are the strengths and weaknesses of the Education Consolidation and Improvement Act of 1981?
- How do you think the 1981 law will affect the organization of the Title I office within the state agency?
- Do you think there will be overall changes in the state's management strategy when you operate under the new legislation?
- How do you think the relationship between your state agency and your school districts will change?
- Do you think there will be more opportunity for creativity in state management under the 1981 law?

Regarding the strengths and weaknesses of the new law, the Chiefs had both strongly positive and strongly negative reactions. Positive reactions which were expressed by nine chiefs, included:

> We're glad to see less federal involvement.
>
> The new law is getting us to stop, think, and plan for what we really need and can do.

Negative reactions were expressed by eleven chiefs. Perhaps the most negative reaction was stated this way:

> This is just the beginning of federal adbandonment of needy children. There are no strengths to the new law. It represents a national trend of looking out for oneself rather than the disadvantaged. A generation or so of society will be neglected by the federal government.

Regardless of whether favorable or unfavorable reactions were elicited to the intent of the new legislation, the Chiefs were concerned with the reduction in funds that was anticipated. It was on this point that there was greatest concensus among the Chiefs. During the period in which the interviews were conducted, budget cuts from 10 percent to 50 percent of current levels were rumored to occur.

Four of thirteen top level executives interviewed felt there would be no major change in the organization of the Title I office within the state agencies. As one of the Chiefs said,

> There is minimal federal involvement in our state anyway so there will be no real change in the delivery system. What will really hurt is the drop in administrative funds.

It is the latter point that states felt would bring about the most significant changes. With fewer administrative funds, cuts in Title I staff might be needed. One state said the dropped staff would probably be monitors and auditors. In a similar vein one state official said:

> The cut will cut down on paperwork and allow more time for technical assistance and prorgram-related activities.

At the other extreme, one state felt the reduced funds would mean they would have to concentrate on the essentials of auditing at the expense of providing technical assistance to aid program development.

Responses on whether or not there would be overall changes in the state's management strategy ranged from "none," and "very minor," to "drastic." The changes that were anticipated include:

> We will try to fill the gap left by the feds pulling out of a leadership role...We will not add rules and regulations, we trust our LEAs. But we will attempt to be motivators.
>
> The state will probably have to raise taxes to fill the void in reduced financing.
>
> The massive reduction in funding will mean the state will provide less assistance to LEAs.
>
> There will be less policing and less whipping.
>
> We will do a little less monitoring.

It seems clear that, in early 1982, the Chief State School Officers were not unanimous on the changes ECIA would bring about for Chapter 1 programs. Some were uncertain or saw little change. One indicated that, since the Title I program has been operating so successfully in that state, he saw no need to change it to operate under Chapter 1. Others foresaw a drop in monitoring and enforcement functions, while still others anticipated a drop in assistance provided to LEAs.

Five Chiefs felt the relationship between the state and the districts would change very little and that prior positive and trusting relationships would continue. One state felt their relationship with districts "will improve if anything; there will be a greater partnership even than before." Another felt there would be "less policing and less whipping." Similarly, two states thought there would be positive results from the increase in technical assistance over monitoring activities that they foresaw. As one of these states said:

> The new law will enable the state to be seen less as the heavyweight and more as a provider of technical assistance.

However, another Chief felt the potential was there for the state now to be viewed as the adversary rather than the federal government, particularly because this Chief felt the SEA had to put more emphasis on auditing.

The final question put to the Chiefs was "Do you think there is more opportunity for creativity in state management under the 1981 law?" Only four felt this would not be the case. A sampling of their responses are:

> We need clarity from the feds, not an opportunity for creativity. In the past creativity led to audit exceptions.
>
> Opportunity for creativity has always been there. There has always been enough flexibility to permit creativity.
>
> Creativity is the wrong word. There will be a need for more leadership to find resources to serve the disadvantaged. The state will have to fill the gap left by federal withdrawal.

Three Chiefs answered positively and gave examples of the type of creative management that they envisioned: more consolidation of state and federal education programs; children will now not have to be labeled to receive services and more preventative rather than corrective programs can be initiated; and the SEA may ask larger districts and colleges to provide some needed technical assistance that the SEA can no longer afford to do. One Chief enthusiastically indicated that his state had "all the local and state capabilities in place to provide the educa- tional leadership needed under the new law." In another case, the Chief felt that "the new law has given us a chance to review our program." The expectation was that activities that appeared to work, such as Title I-- which had raised test scores 20 percentile points--would stay, while other less successful activities would suffer.

The one point on which most Chief State School Officers tended to agree is a concern over the drop in funds, particularly for state administration. There was division among the Chiefs sampled over the changes, if any, that this reduction will bring about. Roughly one-third saw little change, or did not specify any changes they foresaw. Another third saw less monitoring and enforcement, more technical assistance, and thus an increasingly positive relationship with their districts. The other one-third took a less sanguine view. They believed that the reduced funds will mean they must take more of a "heavy" role and that past opportunities for technical assistance to LEAs will diminish.

Initial Reactions to ECIA Expressed by Federal Programs Coordinators

The term Federal Programs Coordinators as used here refers to individuals situated above the level of the state Title I coordinators but below the Chief in the state management hierarchy. They were asked the same questions as the Chiefs were asked. In general, their responses focused more directly on the specific changes anticipated under Chapter 1.

Eleven of these state officials cited both strengths and weaknesses of the new law; six enumerated weaknesses only, and one state had no comment.

The major strengths that were enumerated are:

- More discretion for LEAs (can now look at children and not regulations) (N=4);
- the block grant concept, which allows for a consolidation of programs (N=2);
- elimination of particularly troublesome requirements, such as comparability, Parent Advisory Councils, and use of Normal Curve Equivalents (N=3);
- loosening up of particularly troublesome requirements, such as maintenance of effort and supplement not supplant (N=2).

In sum, the less rigid requirements, the greater state and local flexibility afforded by the less red tape, and the elimination of unnecessary federal intervention beyond the intent of the law characterized these positive responses.

The major weaknesses of the Act as perceived by these state officials include:

- reduction in funds (N=11);
- vagueness, lack of specificity (N=7);
- elimination of Parent Advisory Councils altogether (N=6);
- uncertainties regarding particular requirements, such as whether audits will be mandated, whether lack of evaluation reporting will cause demise of program, and the meaning of the third allocation option ("part of the funds for all such children") (N=6);
- fear that the law makes it appear that states have more authority than they really do (N=2);
- fear that innovations will be stifled (N=1); and
- concern that less monitoring will be conducted (N=1).

It is interesting to note that changes to two requirements were noted as strengths by some state officicals and as weaknesses by others. The loss of a federal evaluation reporting requirement was heralded by some as an advantage due to the increased options allowed in this area for states and locals. Others saw it as a loss, since Congress would no longer see the program being accounted for and hence, fewer dollars were likely to be forthcoming to support the program. Similarly, the elimination of the parent advisory coucil elections and supporting membership requirements were viewed by some as advantages. Others, however, felt the advocacy role for parents would be weakened by the elimination of councils altogether.

With respect to changes in the organization of the Title I offices, three officials felt there would be no, or very little, change. Nine stated that the biggest change would be a reduction in state Title I staff, meaning that those left would be spread very thin. Three individuals mentioned that some consolidation of functions would have to take place. One of these anticipated that Title I, Bilingual, and Migrant programs would be consolidated. The other two felt that technical assistance and monitoring of several programs would have to occur simultaneously. In line with this, two federal project coordinators said the state would engage in less monitoring and technical assistance, primarily because onsite visits would simply be too costly.

Several of the officials indicated reorganizations of the state agency would result to gear up for implementation of both Chapters 1 and 2. In these cases, program functions might be coordinated across programs if appropriate, which might affect the selection of staff available to work on the Title I program. Staff cuts in another state reorganizational process were planned to be on the basis of job priorities established by the state agency. Positions would then be announced--if no monitoring positions were retained in the new reorganization, for example, current personnel whose sole responsibilities consisted of monitoring might be forced to leave.

The federal projects coordinators were slightly more united with respect to the changes that may occur in the states' overall management strategy. Four of them felt there would be a shift away from monitoring and auditing toward more instructional and program concerns. The feeling was also expressed that there will be a greater emphasis on consolidation and a team approach under the new legislation. As one said, "Our former specialists will now become more generalists." Three states said any changes were presently unknown and would be determined by the governors' appointed task forces, and five felt little or no change would occur.

The general concensus among these state-level officials was that changes in the relationship between the state agency and the LEAs would not be major. Four predicted their LEAs would become more independent of them and the SEA would provide only what LEAs requested. One felt the relationship would become strained--"LEAs will see states more as they used to view federal bureaucrats."

The final question asked of these personnel was whether they thought there would be more opportunity for creativity in state management under the 1981 law. The general consensus was "no." Nine responded negatively, four were uncertain, there were three guarded "yes" responses. Only one responded enthusiastically "yes." The latter said

> There is more creativity any time you have less regulation.

The following statement exemplifies those who expressed guarded "yes" responses:

> The opportunity for creativity is there, but with fewer resources and lack of management, I'm not very enthusiastic about this happening. You cannot be resourceful and creative when you are under the gun.

Of the nine who felt the opportunity for creativity would not increase, one gave this answer because it was felt this opportunity had always been there. The others responding negatively attributed their answers to three major causes: a drop in funds for state administration, the fear of audits, and the lack of authority and weakened position of the state agency.

Initial Reactions to ECIA Expressed by State Title I Coordinators

A somewhat more extensive set of questions was asked of the state. Title I coordinators. These questions related to the strengths and weaknesses of the new legislation; the changes in relationship, roles, and responsibilities at the federal, state, and local levels that might result from the new legislation; and states' perceived needs for assistance under the Education Consolidation and Improvement Act.

Perceived Strengths and Weaknesses of ECIA

When asked to enumerate the strengths of the new legislation, several coordinators felt it was too early to tell and three said flatly that there were no strengths. A coordinator who wanted to withhold judgment said

> It would be great if effective programs can be run with less paperwork and continue without detailed accountability data, but I suspect this will not be the case.

The strength of the new law cited most frequently was the increased flexibility and reduction in restrictive specific requirements. Changes in the following requirements were welcomed:

- comparability,
- parent involvement,
- maintenance of effort,

- selection of attendance areas,
- excess costs,
- complaint procedures, and
- state applications.

The reduction in paperwork the new law will afford was also heralded.

While many coordinators were pleased that some of the restrictive requirements of the previous legislation have been lifted, many had a concomitant fear that perhaps the legislation had gone too far. Four coordinators felt the law lacked clear specifications regarding what the appropriate role of the SEA should be. A major concern of three additional coordinators was accountability: Who would be held accountable? How would audit exceptions be determined? These coordinators felt that clearer prescriptions in this area would have greatly strengthened the legislation.

The changes in the parent involvement provisions also created ambivalent feelings in many of the coordinators. The following comments were typical:

> They should not have eliminated PACs but rather allowed states to determine appropriate PAC structures.
>
> The elimination of parent involvement requirements is a strength, but it will be a weakness if it diminishes the parent involvement effort.
>
> The elimination of PAC elections, while they were overly prescriptive, will certainly weaken the advocacy role of parents and the effectiveness of programs.

Seventeen of the coordinators cited strengths of previous Title I legislation that they felt are missing from the 1981 law. The common theme was that clear specifications are necessary and are now absent. As one coordinator said: "The good working detail is almost totally missing." Coordinators cited specifications regarding parent advisory councils, complaint resolution, non-instructional duties, evaluation reporting, targeting, supplement not supplant, comparability, identification of students, maintenance of effort, accountability, and private school participation. While coordinators as a group welcomed many of the changes in these areas, they also realized that the changes could create problems. Two comments are illustrative:

> Clear specifications of federal, state, and local roles are missing. Some people are basically followers. They need detailed procedures in order to operate.
>
> Your reaction to the new law depends on whether you want definitive rules. The new law is open to interpretation.

When asked whether there was more opportunity for creativity in state management under the 1981 law, 10 answered affirmatively. The following comments are typical of these responses:

> Yes. The law mandates that states be more creative since the purposes of Chapter 1 are the same without prescriptive guidance on how to accomplish the mission.
>
> Yes. Because of the reduction in the number of things we have to get assurances for, there will be more time to focus on program development rather than management.

Seven coordinators felt there would not be more opportunity for creativity. Three stated the opportunity had always been there and would not increase. The remaining three commented as follows:

> There will be more responsibility but not more creativity.
>
> The new law will reduce creativity. Staff reductions mean we can only focus on compliance issues, not program improvement.
>
> Creativity is not the right word. The SEA doesn't have its own educational agenda. It will continue to assist LEAs in what they want to do, provided it is legal and quality education.

In sum, the state Title I coordinators can see both the positive and negative sides of the new legislation. Because they have more invested, they are in many ways more hopeful than their superiors in the state education agencies. But they are also more familiar with the past legislation. They worked with it, felt they had achieved quality programs, and thus are somewhat more cognizant of what they possibly stand to lose.

Changes in Relationships, Roles, and Responsibilities at the Federal, State, and Local Levels

Although there was considerable variability in the responses of the state Title I coordinators interviewed, the general consensus is that relationships will change under the new law. "The fact that Congress didn't spell them out is pretty damning" and "I would like the feds to provide much more detail on this" were two of the comments. Several coordinators felt there would be a considerable reduction in the federal role, and three felt the state role would change to include more technical assistance and less monitoring and enforcement. Five coordinators felt there would be an overall increase in the level of state responsibility. The following comment is representative of this group:

> The federal government still has the responsibility to make sure we spend money correctly and for program evaluation. The state has to take more responsibility for everything else in combination with the districts. This relationship may be hard to work out.

One state planned to take a great deal of responsibility and commented:

> The SEA will try to make LEAs feel as though the law has not changed.

One state assessed the situation in this manner:

> The federal department will provide much more technical assistance. The SEA will have to develop more regulations, be responsible for program development, be less compliance oriented, and focus more on using available resources for more effective programs. LEAs will take responsibility for demonstrating size, scope and quality, and the SEA and LEA will work together more.

Coordinators were then asked how they thought the relationship between the state and the districts would change. Eight coordinators felt the relationship would not change. One felt there would be a closer working relationship and one predicted LEAs would need help with different kinds of issues but did not specify them. Seven coordinators felt the LEAs would become more "powerful," "adventurous," and/or "independent."

When coordinators were asked "How do you think the decrease in funds for state administration (from 1 1/2 percent to "up to 1 percent") will affect the state role?", those states receiving the minimum in administrative funds under Title I said the change would not affect them very much. In fact, several projected they might get more administrative funds under Chapter 1. Three stated they would get by in the immediate future on carry-over funds. All others said that services, or staff would drop and, as a result, the focus would change.

Coordinators were asked, "If the federal role is lessened, do you think states will assume more of the responsibilities previously held by the federal government, such as that for technical assistance and development of policies and guidelines?" Some felt the states had always been more active in this regard and no change would be required. To quote one state:

> States have always done these things. The few times the feds have done them, they did them poorly.

Six states felt they would not assume more of these responsibilities, primarily because they would not have the funds to do so. However, nine states answered affirmatively. In general, this was not something the coordinators welcomed:

> Technical assistance and policies could be taken over by SEAs because the feds have performed poorly in these areas, but the states have no well defined role in the law.
>
> Yes, states will do more, but they are trembling in fear of being audited by the Inspector General.

Coordinators were then asked, "How do you think the relationship between the state and the U.S. Department of Education will change?" Thirteen coordinators felt that the relationship would diminish and that the states and the federal government would become more independent of one another. In this regard, one coordinator mentioned he would miss ED's efforts to get the coordinators together to discuss issues. As a part of this diminished relationship, two coordinators suspected the federal government would rely on dissemination of materials in the future rather than personal contacts. Other coordinators felt federal personnel would assume a role of providing more technical assistance to states and thus the relationship would be enhanced.

When asked "What would you like the federal role to be?" three basic categories of responses emerged. Four states specifically mentioned they wanted to be independent from the Department of Education and wanted ED to keep mandates to a minimum. For example:

> They should be less regulatory. They should assume an advisory role, but still in a position to provide technical assistance to states.

Nine coordinators agreed that they would like ED to provide them with technical assistance. The following two comments are examples:

> They should provide interpretative kinds of information, have a dissemination function, and provide onsite technical assistance.
>
> They should provide information consistently. I would like more personal contact through workshops for help in specific areas.

Three coordinators would prefer a more authoritative role:

> They should provide authority and detailed guidelines.
>
> Their role should be one of interpreting the law.

States Perceived Needs for Assistance under the Education Consolidation and Improvement Act

Coordinators were asked four questions related to this issue:

> Do you perceive a need for assistance under the Education Consolidation and Improvement Act of 1981?
>
> What kinds of assistance would you want? On what topics?
>
> Who might best provide this assistance?
>
> What methods for providing the assistance would be best?

Thirteen coordinators indicated a need for assistance under ECIA. Several coordinators indicated no need for assistance. The reasons given for negative responses were:

> Our staff members are generalists and will need no help, but other states will.
>
> Less federal interference and assistance would be better.

Seven of the states saying they perceived a need for assistance indicated they would like more precise definitions and guidelines. While some of the coordinators were aware of the "nonbinding guidelines" provided by the Department of Education, uncertainties as to their legal standing were prevalent.

When asked about the kinds of assistance they would want, these topics were frequently mentioned:

- greater clarification on specific state roles and responsibilities (N=8),
- clarification of new audit procedures under A-102P (N=5),
- evaluation assistance and continuation of TAC services (N=4),
- program improvement assistance and more information on exemplary practices and relevant research findings that could be used to improve Title I programs (N=5),
- help in providing technical assistance on program matters to their districts (N=2),
- assistance in curriculum development (N=2), and
- information on how other states are implementing Chapter 1 (N=1).

Responses to the question regarding who might best provide the desired assistance were as follows: Eleven states would prefer that ED continue to provide the assistance. Six mentioned the usefulness of the Evaluation Technical Assistance Centers (TACs), and two of these coordinators expressed the hope that TAC roles would expand to include technical assistance on issues such as parent involvement and curriculum in addition to evaluation. Two coordinators cited the types of assistance they received in the past from private contractors and the results of federally sponsored research studies. Individual coordinators mentioned the National Diffusion Network, the Regional Educational Labs, and Regional Federal offices.

The final question addressed the best methods for providing assistance (for example, exemplary materials, informational workshops or materials, or regional meetings). The coordinators felt that all of these methods had a purpose and all should be used to meet individual needs. Several coordinators cautioned that face-to-face meetings or workshops had to be conducted by knowledgeable people.

In sum, at the time these data were collected, the state Title I coordinators felt the need for some assistance. Although responses varied greatly, in general it can be said that most coordinators are at least guardedly optimistic about the future. It appears, however, that some assistance along the lines mentioned in this chapter would be appreciated and facilitate the transition from Title I to Chapter 1.

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